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2 September 2015

Mr Duncan Rowland
Executive Manager Biosecurity
Animal Health Australia
Suite 15, 26 Napier Close
DEACON ACT 2600

Dear Duncan,

Proposed Future Strategy to manage Johne's disease in cattle

The dairy industry welcomes the opportunity to contribute further concerning the review of the National Bovine Johne's Disease Strategy. This is a joint submission from the Australian Dairy Farmers Limited (ADF) and Dairy Australia on behalf of the Australian dairy industry.

The dairy industry notes the outcomes of the widespread consultation and recognises that there is support for a less regulated approach to manage Johne's disease in cattle.

The dairy industry seeks to continue to manage the impact of clinical Johne's disease and to support provisions that protect unaffected herds from infection with *M. paratuberculosis*.

In order to meet trade imperatives in a precautionary approach the dairy industry believes that the future strategy should continue to reduce the contamination of farms and farm products by *M. paratuberculosis*.

In order to achieve these objectives in a less regulated environment the dairy industry recognises that dairy industry programs may need to be modified.

Industry led voluntary programs allow farmers to manage risks in the context of their business objectives and we support the adoption of Johne's disease management in farm biosecurity programs. This will facilitate improvements for wider biosecurity outcomes that solely Johne's disease.

Following initial discussions and consultation with State dairy farming organisations the ADF and Dairy Australia have developed the attached preliminary recommended revisions to the Dairy Industry BJD Assurance Score.

The draft revised Dairy Score is based on the current criteria that supports risk-based trading and provides an extension tool to help farmers understand how they can achieve higher levels of assurance.

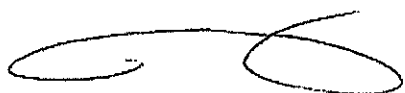
The draft revised Dairy Score focuses on biosecurity measures, particularly hygienic calf rearing, with incorporation of herd tests at the higher levels to monitor and verify the integrity of the Score.

We recognise there are still uncertainties about the outcome of the review and that more work will be required to provide details to support the principles outlined in the proposed future dairy industry initiatives.

ADF and Dairy Australia will continue to consult with State dairy farming organisations and jurisdictions, in particular, Queensland and Western Australia, and work together on developing, refining and finalising the draft revised Dairy Score.

We seek your assistance in the consideration of these draft dairy industry recommendations in the drafting of the revised national strategy.

Yours sincerely



David Losberg
Senior Policy Manager
Australian Dairy Farmers Limited



Robin Condron
Manager Animal Health and Welfare
Dairy Australia

REVIEW OF NATIONAL STRATEGY TO MANAGE BJD

DAIRY INDUSTRY RECOMMENDATIONS

CURRENT BJD STRATEGY AND APPROACH	PROPOSED FUTURE STRATEGY
Dairy Industry Objectives Dairy industry wants to manage the spread and impacts of BJD by getting most producers involved in preventing and managing the infection. Advancing Australia's favourable animal health status and precautionary risk management for markets if public health perceptions or concerns are raised.	Revised Dairy Industry Objectives Dairy industry wants to manage the impact of disease from BJD and protect unaffected herds from infection. Industry-wide goal for management of risks to international markets without undue costs to producers. Industry voluntary measures incorporated in farm biosecurity programs.
National Goals <ul style="list-style-type: none"> • Reduce contamination of farms & farm products by <i>M.paratuberculosis</i> • Protect the status of non-infected herds and regions • Reduce the social, economic and trade impacts of BJD at herd, regional and national level 	Revised National Objectives Under review
Dairy BJD Assurance Score Voluntary industry tool to facilitate risk-based trading and to provide clear pathway to progress herd status Assurance based on control measures (biosecurity & calf hygiene), history of infection and testing. Differences in recognition by jurisdictions	Revised Dairy BJD Assurance Score Simplified requirements Based on current criteria Transition for Qld & WA herds More emphasis on biosecurity Improved status progression by HEC testing Alternative to Cattle MAP
Hygienic Calf Rearing Protecting calves from exposure to <i>M.patatb</i> to minimise infection and reduce disease 3 Step Calf Plan – universal inclusion in dairy QA JDCAP – More audited requirements	Hygienic Calf Rearing Continued focus on managing impact of BJD by protecting calves. (Reduced exposure diminishes risk or onset of clinical disease.) Calf hygiene recognised as additional individual assurance point(s) in Dairy Score
Regulated controls National Standards, Definitions, Rules and Guidelines Movement controls based on State Zone Status National Cattle MAP	Regulated controls Likely less regulated Program and removal of regional zoning. Revised National SDR&G

DAIRY HERD SCORE	CURRENT DAIRY BID ASSURANCE SCORE		PROPOSED REVISIONS TO DAIRY SCORE	
10	Cattle MAP MN3	3 negative herd ELISA Management Plan (introductions, investigation of suspects, record keeping, annual vet review & audits) Non-Assessed herds in WA	MAP MN3	Revised MN3 ?
9	Cattle MAP MN2	2 negative herd ELISA Management Plan (introductions, investigation of suspects, record keeping, annual vet review & audits)	MAP MN2	Revised MN2 ?
8	Cattle MAP MN1	1 negative herd ELISA Management Plan (introductions, investigation of suspects, record keeping, annual vet review & audits) Non-Assessed herds in QLD	Monitored Negative or MAP 1	NA Herds in QLD & WA or previous Dairy Score 7 with 2x HEC negative tests Mandatory biosecurity controls Annual vet biosecurity review - covers introductions, calf hygiene and health check Monitored status by biennial HEC test OR Revised MN1 ?
7	Herd Tested Negative	No history of infection and tested by either MAP standard Tested 4YO Check tested ELISA (50) or HEC	Herd Tested Negative Calf Hygiene & Check Tested (6 HEC)	No history of infection and negative HEC OR Previous Dairy Score 6 with two annual negative HEC Calf hygiene maintained Monitored status by biennial HEC test

6	Restricted Stage 2	Approved control program under SDR&G Two negative herd ELISA	Tested Negative 2 Calf Hygiene & HEC negative (4)	Previous Dairy Score 5 with two annual negative HEC OR negative herd ELISA after 2 years Calf hygiene maintained Annual negative HEC
5	Restricted Stage 1	Approved control program under SDR&G One negative herd ELISA	Tested Negative 1 Calf Hygiene & HEC negative (2)	Previous Dairy Score 4 with negative HEC or herd ELISA and high risk cows removed Calf hygiene maintained Annual negative HEC
4	Tested Low Prevalence	Seroprevalence <1.5% (or <2% in cows 4 years or older), calf hygiene and culling of reactors OR Non tested (assessed) herd with 3 step calf plan >4 years	Infection – Controlled calf hygiene & biosecurity	No clinical disease > 5 years Calf hygiene implemented > 4 years High risk cows identified Optional: seroprevalence < 1.5% or HEC test positive Optional: BJD vaccination
3	Tested Moderate Prevalence	Seroprevalence <3% and >1.5% (or <4% and >2% in cows 4 years or older), calf hygiene and culling of reactors or clinical cases	Infected Calf hygiene & controls started	History of infection no clinical disease > 3 years Calf hygiene implemented < 4 years Optional: BJD vaccination
2	Tested High Prevalence	Seroprevalence >3% (or >4% in cows 4 years or older), calf hygiene and culling of reactors or clinical cases	Clinical disease – calf hygiene	Clinical disease within < 3 years of home-bred cow Calf hygiene implemented Optional: BJD vaccination
1	Infected or Suspect	History or trace of infection or disease	Clinical disease – no control	Clinical disease within < 3 years of home-bred cow
0	Non-Assessed	Non-Assessed herds in SA, NSW, VIC and TAS	Non-Assessed	Non-Assessed herds with no controls (or 3 step calf plan <3years)

New Dairy Score 8 - Monitored Negative Status

Progression from Dairy Score 7 or transition for non-assessed herds in Queensland and Western Australia. For maintenance requires; Biosecurity controls, Hygienic calf rearing, Biennial negative HEC and Annual biosecurity review.

If herds in Qld and WA have no annual biosecurity review still eligible for Dairy Score 7 with negative herd test.

Hygienic calf rearing

Implement the 3-Step Calf Plan as incorporated in all dairy company on-farm quality assurance.

Step 1:

Calves should be taken off cows at least twice per day, and ideally within 12 hours of birth. Prompt calf removal reduces the exposure to potentially infectious material from either the dam or the environment. Young calves are most susceptible to infection. Early removal also provides opportunity to ensure adequate colostrum is fed (reference Rearing Healthy Calves)

Step 2:

Management of the calf-rearing area should ensure that no effluent from animals of susceptible species comes into contact with the calf. Effluent containing faecal material from cattle, goats, alpaca and deer (also sheep) is potentially infectious to calves. By keeping the calf-rearing area free from effluent sources calves will also be less likely to develop other infections. Effluent should not be transferred to the calf-rearing area by people or equipment.

Step 3:

Calves up to 12 months old should not be reared on pastures that have had adult stock (or stock that are known to carry BJD) grazing on them during the past 12 months. Cattle develop age-related resistance to BJD. By the time cattle are 12 months old they are at low risk of becoming infected.

Annual Biosecurity Review

Monitored negative herds require verified biosecurity practices. Discussions are taking place with AVA Australian Cattle Veterinarians to develop annual planning consultations for animal health programs. It is proposed these consultations could include consideration of the farm policy and checking health status of introduced cattle for selected diseases (including BJD), monitoring herd health status and calf hygiene practices. It is suggested that cattle would not be introduced to a Monitored Negative Herd unless they had a Dairy Score 8 (and/or possibly from a herd with a Dairy Herd Score 7 and an additional individual point for calf rearing).

Alternatively on-farm QA programs may provide a mechanism to confirm biosecurity measures are in place.

BJD Herd Environmental Culture Test (HEC)

A negative HEC test every 2 years monitors that control measures are effective and Dairy Score 8 is maintained. For Dairy Score 7 progression to Dairy Score 8, two annual negative HEC tests or test to MAP Standard and verification of biosecurity controls.

HEC is a culture based test which is currently recognised as equivalent of a Check Test.

A composite faecal sample is collected from the dairy yard immediately after milking. The test has a moderate sensitivity >50% in herds with low seroprevalence and 100% specificity so there are no false positive results.

Administration and accountability

Apart from the record keeping by individual producers, it is likely that arrangements would be needed for third party verification of Dairy Score 8 status. This would require reporting of annual vet biosecurity assessments and biennial HEC test results. Possibly a role for industry organisations as a service to members or incorporated in on-farm QA by dairy companies as a service to suppliers?

THE COUNTRY REGIONS COUNCIL OF WA (Inc)

(established Mandate to Govt. 1947.)

President: Mrs Judy Hebiton
11 Peckham Crescent,
Kingsley W.A. 6026
Phone: 08 9409 8778

Secretary: Alice Bowen
131 Joel Terrace,
Mt Lawley WA 6050
08 9272 3105

Mr Duncan Rowland
Animal Health Australia
Suite 15, 26-28 Napier Close
DEAKIN ACT 2600

Dear Mr Rowland,

For your information a copy of our letter to the Director General of Agriculture WA in regard to Johnes's Disease.

Re: Johnes's Disease

Our organisation has been approached by the Cattle Producers of Western Australian with their concerns on the moves in the potential push for a National deregulation for movement of cattle throughout Australia, which would eliminate testing for Johnes Disease for areas requiring it. We see it as a strong push from Eastern States producers who want to gain easy access into WA., which they would otherwise not have because of the current States Freedom status.

Under the National Johnes Review Committee consultation process, a meeting was held in Brisbane where only 8 producers attended, & in Melbourne 24 attended. At the meeting in WA, we had 80 attending, which 72 were producers. At this meeting only 2 were for deregulation, of which one was a Victorian with a vested interest. The MAIN CONCERN expressed was the effect this would have on our Live Export Market. WA is reliant on the Live Cattle Export which consists of approx 45-50% of the total numbers exported out of Australia, N.T coming close behind and eastern States approx 10% or so of the export figures. The Importing Countries require no clinical signs of Johnes Disease between 2 and 5 years, and our status is vital for our states maintenance of this market.

One or 2 producers see it important to go back to retesting to prove our States Freedom Status, as a result of impression gained from a Dept of Agriculture Officer mentioning that WA hasn't done much testing currently. This is not so, at another meeting a dept officer advised that testing has been done. The Dept of agriculture advises us that on going testing has been done on an annual basis to meet the States regulatory requirements under the states Freedom basis under Animal Health Australia.

Another point to maintain our States Freedom Status is that there is increasing evidence that MAP (Mycobacterium ovium sub partuberculosis) Johnes, may have a role in Chrones's Disease in Humans, and information now shows that one of the bacterium from MAP has been identified in Chrones disease.

..2.

W.A. also has a State Health Regulation to maintain its disease freedom, which includes Johnes Disease, and other diseases, coming in WA. Another is EBL, which all dairy cattle coming into WA are tested for, as concern is there that EBL has a possible strong link to Leukaemia in humans. WA and our Dairy herds is Free of Johnes Disease & EBL.

It has also been proven that Johnes traces is not killed 100% by pasteurization in milk, WA dairy cattle are free of traces of Johnes disease.

As mentioned before, 1 or 2 producers are suggesting retesting the State's cattle herds, this is not necessary, as our Dept of Agriculture has maintained a stringent quarantine entry requirement, this will not only cost the Industry dearly, but will also give the **misconception** that we are not happy with the States Freedom Status, **giving fuel to those wishing to deregulate** & that the Dept of Agriculture has not done its job, and will give them easy access to WA.

Deregulation will mean a rising cost to the Beef Producers wishing to maintain their status which would be necessary for movement of their livestock across borders & overseas as breeders, currently it would cost them approx \$3000 every 2nd year, and those with sheep may also need to pay for testing their sheep as well.

From our understanding, States with higher health status for movement of cattle, are still looking at maintaining their current health status. eg. Q'ld is protected as is N.T., the South Australians have informed us that they have worked hard towards cleaning their management herds, and will not be keen to lower their status.

Its legislated in each state and each States responsibility to look after their states interests. The Dept of Agriculture has re-iterated that they would listen to the producers and their wishes. The producers have spoken.

The WA Producers, The States Breed Societies who represent big numbers of Cattle breeders, commercial breeders have all strongly recommended that the State Maintain its status Quo.

Pastoralists we have spoken with have also indicated that they are happy with the current import regulations, they have no problems sourcing bulls from studs in Q'ld, who are complying with WA's import regulations. One of these pastoralists has 100 bulls coming into WA shortly.

What the general producer thought was that the National Johnes Review Committee would be looking at was to reduce the trauma of trace forward quarantine, should 1 imported animal test positive, and effect every property livestock had moved to, NOT DEREGULATION.

It is suggested that:- TRACE FORWARD quarantine be looked at by that Committee,

Look at random testing of Older Cattle at abattoirs.

More work has to be done in improving testing accuracy, especially individual animal tests.

Perceived connection between Johnes & Chrones disease is a big concern. possible vaccine for Chrones is down the track, this would then eliminate the problem with Johnes disease.

Once testing technology is improved, then WA producers would consider relooking at the state border issue.

.../3

Attendees at the WA Meeting commented that it cost the WA Industry a lot financially to establish the states Freedom Status, which they want to maintain.

Ongoing testing to comply with State Regulation with A.H.A., is being maintained.

The United Beef Breeders have submissions from the states Breed Societies and approx 1/2 inch emails from producers advising maintaining the states BJD Free status. (not one for deregulation)

TO CONCLUDE: The Western Australian Cattle Breeders have said that they wish to maintain the States Johnes Free Status, therefore there will be no legislation changes required. The Dept of Agriculture has also said that they would do what the producers recommend. The CATTLE PRODUCERS HAVE SPOKEN.

Yours sincerely

Judy Hebiton (Mrs)
President.

4 August 2015

Dr Michelle Rodan
Director Livestock Biosecurity
Livestock Biosecurity Policy and Planning.
Dept. of Agriculture and Food, WA

Email: michelle.rodan@agric.wa.gov.au

Dear Dr Rodan

Reportable disease importation risk – Bovine Johne's Disease (BJD) and others

At the 2015 Annual General meeting members of the WA State Branch of Holstein Australia (HA) registered their concern to what has been described as a government proposal to review of the disease import standards for beef and dairy cattle entering WA from the Eastern States.

Our members implore you, the Dept. of Agriculture and Food, WA and the State Government not to consider such a proposal. Any relaxing of the current restrictions has the potential of putting both the dairy and beef cattle industries in WA at risk to an accidental introduction of reportable diseases in particular Bovine Johne's disease or Liver Fluke.

The high cost to producers of disease surveillance and treatment and keeping the WA herd clean of these diseases should also be taken into account.

WA is so fortunate to be free of these diseases and our industry should not put at risk our competitive advantage when competing for export cattle markets.

Our Association is of the firm belief there is no case for importing live cattle into this State as low disease risk genetic material of elite pedigree animals is and has been used in WA for many years through technologies such as artificial insemination and embryo transfer.

I look forward to a favourable response on this issue to safe guard the future health of the WA herd.

Yours faithfully,

Geoff Jenkins
WA State President
Holstein Australia

Don Lawson
Ythanbrae Angus
Yea VIC

The Johnes's review continues at great expenses so that those responsible can say we have consulted industry,

Unfortunately those responsible for precipitating the review, Cattle Council and Animal Health Australia, have failed to submit appropriate presentations. Importantly they have failed to explain the behaviour of the organism in layman's language to their constituency. Keeping their constituency informed is clearly one of their important roles, and their failure in this important area raises serious questions about the standard of advice they have been receiving and disseminating.

They have failed to inform stakeholders that the disease has two phases. The first being an infection phase where the organism resides inside the cell; in layman's terms in this phase it is inert and basically impossible to detect. In a healthy animal in the infection phase the infection may remain inert for the lifetime of the animal.

The second phase occurs when the animals' immune system is run down and the organism changes shape and becomes the disease phase. In this phase it is very slow growing and sheds intermittently so the faeces test is unreliable. Testing can produce a positive response one week and a negative response the following week from the same animal.

Unfortunately industry, backed by government veterinarians particularly those in the old Victorian Department of Agriculture, have established the discredited eradication program and an attempted control policy when there is no reliable test or cure.

The focus should be on assisting industry to manage the disease as it does with a number of other diseases. To do this industry needs a freely available vaccine and management programs that encourages a reduction in the age structure of beef cattle herds, reticulated water systems and, in the case of the dairy industry, bird proofing calf feeding.

Animal Health Australia has also failed as the managers of the MAP program. They have failed to address the fact that only around 460 seed-stock herds out of a potential 10,000 are actively involved in the program, and why participating herds continue to drop out. Furthermore those believing that they are contributing to the industry by remaining in the MAP are being destroyed without compensation if they are found, by unreliable tests, to have animals with either the BJD strain or OJD strain.

I am very angry to be told by the VFF/ CCA and AHA that the MAP is a voluntary program. It is not. We have an extraordinary situation where we expect diseases to respect state borders, and if cattle are to be traded interstate it is compulsory for those operations to participate in the MAP. Under the current arrangements it is much easier to export than it is to trade within Australia.

I was concerned to learn at the Perth meeting that there has not been any testing in Western Australia for twelve years and they claim to be JD Free when OJD is endemic.

I was also concerned to learn that the Western Australia program was being supported by seed-stock breeders who want to stop Western Australian commercial breeders from accessing genetics from interstate.

It is time to acknowledge that the JD policy has been a total failure. It has resulted in many rural families having to cope with substantial financial loss resulting in anxiety, depression and suicide. It is reliably estimated that suicides partially attributable to the failed MAP could be between 30 and 60. There is plenty of evidence to suggest that the entire JD fiasco should be the subject of a Royal Commission.

In the meantime the Johnes's review rolls on at great expense. This expense can only be justified if the review recommends comprehensive and sensible changes to the management of JD that ensure the industry will be able to freely trade cattle throughout the country.

I am also very concerned to learn that the red herring of Crohn's Disease is being dragged back into the discussion despite the fact that there is absolutely no evidence of any relationship between Crohn's and Johnes's. Any mention of Crohn's in any literature referring to the management of Johnes's disease can only do untold harm to the cattle industry.

UNITED



BEEF BREEDERS ASSOCIATION OF W.A. (INC.)

Postal Address: P.O. Box 135, Claremont, W.A. 6910 Tel: (08) 6263 3100

Secretary: Royal Agricultural Society of W.A.

Fax: (08) 6263 3171

Mr Duncan Rowland
Animal Health Australia Ltd
Suite 15, 26-28 Napier Close
DEAKIN ACT 2600

September 7th 2015

Dear Duncan

Re: UBBA regarding Johne's Disease.

I have been instructed to forward to you a copy of a letter from the UBBA, which has been sent to our Director General of the Agricultural Department, WA., on the stance taken by the Cattle Breeders in Western Australia – Pastoral and Agricultural Sectors, regarding the States Freedom Status for Johnes Disease.

Yours sincerely

Kathleen M. Lovelock (Mrs)
UBBA Executive.

UNITED



BEEF BREEDERS ASSOCIATION OF W.A. (INC.)

Postal Address: P.O. Box 135, Claremont, W.A. 6910 Tel: (08) 6263 3100

Secretary: Royal Agricultural Society of W.A.

Fax: (08) 6263 3171

RE: JOHNE'S DISEASE

The United Beef Breeders Association (WA) Inc: plays a key/vital role in the interests of the States Seed Stock Industry, which also includes the commercial sector.

Our members are seriously concerned about the growing push by the Eastern States Producers to gain access into WA, especially those whose regions are currently not in a clean zone., and the fact that they appear to have gained a growing voice on the National Johnne's Review Committee,

remembering that WA only has 2 voices on this committee, & would therefore be outnumbered in any vote taken.

The National Review Committee conducted a consultation process, with meetings in Brisbane where only 8 producers attending, and in Melbourne 24 attended. AT the WA Meeting, which showed WA's great concern 80 attended, of which 72 were producers. The biggest concern was the effect deregulation would have on their Live Export Market, of which WA's share consists of up to 45 – 50% of the total market in Australia. The importing countries require no clinical signs of John's Disease between 2 and 5 years, and producers were quite vocal in protecting this market, especially as there was a Victorian attending pushing for deregulation at this meeting.

Those attending gained the impression that WA had not been testing for John's Disease regularly, this is incorrect, as was advised by an officer in the Dept of Agriculture on query, who advised that regular testing is being done to comply with the regulatory requirements under the Animal Health Australia to maintain this states John's Free Status.

One of the serious points raised was what appears to be a correlation/connection/perception between Johnne's Disease and Chrones Disease in people. It was pointed out that there is now serious evidence that MAP (Mycobacterium ovium sub partuberculosis) Johnes, may have a role in Chrones disease in humans, and information now shows that one of the bacterium from MAP has been identified in Chrones disease.

WA also has a State Health regulation in maintaining its disease freedom, which would include John's Disease, and other diseases coming into WA. Another is EBL, which all dairy cattle coming into WA are tested for, because of the concern that there is a possible strong link to Leukaemia

In humans. WA and our Dairy Herds is free of Johnes disease & EBL.....2.

.....2.

It has also been proven by International Testing of Dairy Milk, that traces of Johnes can still remain in the pasteurized milk. WA Dairy cattle are free of John's Disease.

It has come to our notice that 1 or 2 producers are calling for retesting of the State's Cattle Herds, this is not necessary, and calls into disrepute the reputation of our Department of Agriculture in not doing a proper job. The Dept has maintained a stringent quarantine entry requirement. Retesting will cost the industry dearly. Export cattle are randomly tested, anything that shows a 'positive' is bought back by the Industry Body, slaughtered and tested. The prevalence of 'false positives' is a grave concern. Stud stock coming into WA have had to undergo tests, and/or come from a Dept accepted accredited property. Our Stud Breeders have also done private testing for their own assurance. Cattle coming in under the radar, have been traced and tested/slaughtered/sent back depending on the results, so the Dept is on top of their job. Your Kalgoorlie & Kununurra Depots do a sterling job.

Deregulation will mean a rising cost to the Beef Producers having to maintain their status which would be necessary for movement of their livestock across borders and overseas as breeders, figures given to us quote \$3000 every 2nd year, + those with sheep may also need to pay for testing of their sheep flock as well., a cost unaffordable.

I have been informed that those States with the higher status, (WA is a Free Zone), Q'ld and N.T., being protected, and the area in S.A., which are working towards cleaning their herds under Management, will not be keen to lower their status.

It is known that each state has its own legislation in looking after their states interests, and our Dept of Agriculture have reassured us the breeders that they would listen to the producers and their wishes. Our producers do not want DEREGULATION – they want to maintain WA's Freedom Status.

The WA Cattle Producers, The states Breed Societies, who represent big numbers of cattle breeders, stud and commercial have all strongly recommended that the State Maintain its Freedom Status quo., including the Dairy Industry, copy of their letter attached. Pastoralists have informed us that they have no problems sourcing bulls, as the Studs in Q'ld are complying with WA's import regulations. One of them is bringing in 100 bulls shortly.

We all thought that the National Johnes Review Committee would be looking at ways to reduce the trauma of trace forward quarantine, should ONE (1) imported animal tests positive, which would affect every property connected. NOT DEREGULATION.

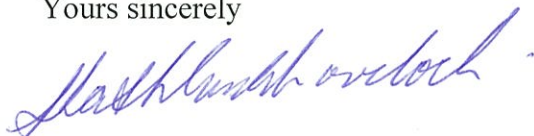
We suggest that THE TRACE FORWARD quarantine issue be looked at by this committee.

- * Look at random testing of older cattle at abattoirs
- * more work needs to be done in improving testing accuracy, especially for individual animal tests.
- * Perceived connection between Johnes and Chrones disease is a serious issue (WA is Free)
(It has been stated that WA has as much Chrones as other States, but Victorian milk eg Devondale & similar brands have been coming in for the past 30 + years)
- * possible vaccine for Chrones is supposedly down the track, this would then eliminate the problem with Johnes disease. (200515)

- * our breeders agree, that once testing technology is improved, then WA producers would look at reconsidering the border issues.
- * Attendees at the WA Meeting commented that it cost the WA Industry a lot financially to establish the states Freedom Status, with ongoing Dept of Ag random testing being done, they wish to maintain this freedom.
- * Ongoing testing to comply with State Regulation with AHA is being maintained.
- * **The United Beef Breeders have submissions from the States Breed Societies and approximately 1/2 inch of emails from producers advising maintaining the states BJD Free Status (not one for deregulation.)**
- * The Department of Agriculture has an excellent initiative with Country and Regional veterinarians requiring mandatory reporting of any signs of symptoms consistent with Johnes disease and all laboratory and pathology testing is done at no expense to the producer.

The Dept of Agriculture have said that they would do what the producers recommend, the cattle producers had strongly called for the retention of the States BJD Freedom Status.

Yours sincerely



Kathleen M. Lovelock (Mrs)
U.B.B.A. Executive
P.O. Box 272, New Norcia WA 6509.
7.9.15

4 August 2015

Dr Michelle Rodan
Director Livestock Biosecurity
Livestock Biosecurity Policy and Planning.
Dept. of Agriculture and Food, WA

Email: michelle.rodan@agric.wa.gov.au

Dear Dr Rodan

Reportable disease importation risk – Bovine Johnes Disease (BJD) and others

At the 2015 Annual General meeting members of the WA State Branch of Holstein Australia (HA) registered their concern to what has been described as a government proposal to review of the disease import standards for beef and dairy cattle entering WA from the Eastern States.

Our members implore you, the Dept. of Agriculture and Food, WA and the State Government not to consider such a proposal. Any relaxing of the current restrictions has the potential of putting both the dairy and beef cattle industries in WA at risk to an accidental introduction of reportable diseases in particular Bovine Johnes's disease or Liver Fluke.

The high cost to producers of disease surveillance and treatment and keeping the WA herd clean of these diseases should also be taken into account.

WA is so fortunate to be free of these diseases and our industry should not put at risk our competitive advantage when competing for export cattle markets.

Our Association is of the firm belief there is no case for importing live cattle into this State as low disease risk genetic material of elite pedigree animals is and has been used in WA for many years through technologies such as artificial insemination and embryo transfer.

I look forward to a favourable response on this issue to safe guard the future health of the WA herd.

Yours faithfully,

Geoff Jenkins
WA State President
Holstein Australia

ARDCAIRNIE ANGUS
P O Box 301, Kojonup WA 6395
Phone 08 9831 0401 Mobile 0417 942 326

7th September 2015

To the WA Premier, WA Leader of the Opposition, WA Leader of the National Party, WA Minister for Agriculture and Food, WA Shadow Minister for Agriculture and Food, my local MLA member, my five local MLC's, my Federal MP, the Federal Minister for Agriculture, Animal Health Australia Chairman and CEO, Presidents of WAFF, PGA and UBBA.

Dear Mr Munn and Ms Kathleen Plummer

Re National Review by Animal Health Australia (AHA) looking at how Bovine Johne's Disease (BJD) should be dealt with over the next five to ten years:

I have chosen to write to you all as you are decision makers, and/or you are representatives of my industry. I make no apology for drawing your attention to my grave concerns about BJD and decisions that could be made with very negative results for Australia and especially for WA. These concerns are somewhat reduced by my understanding that WA can make its own decisions about its stance on BJD. This means that WA can retain its current BJD Free Zone status with associated restrictions on cattle entering this State regardless of what the National Review Committee decide. It is vital that our State and its cattle industry take responsibility for our own destiny and our own future as far as BJD is concerned.

WA can review its policies in this regard and should perhaps put that review process in place sooner rather than later. This policy should include widespread testing as I understand the last time this was done was twelve years ago. I understand there could be funds available for this testing through the Industry Compensation Fund. Some testing has been done since then to establish reasons for an animal's ill-thrift without finding any evidence of BJD. Testing is also undertaken on animals exported to Indonesia but they are mostly young cattle; BJD tends to not become evident (generally through faecal shedding) until the cattle are four to five years of age.

Enclosed is some background information on the review process as well as my recollections of points raised at the Perth Forum on 11th August 2015, my conclusions from that Forum and from reading and discussions undertaken since then - just to give you some understanding of where I am coming from.

However, this is just background as WA has the power to decide its own future pathway in dealing with BJD.

What would I like you to do? In any way you can:

- 1 ensure the BJD Free Zone status for WA is retained,
- 2 support a widespread testing process in WA as soon as feasible,
- 3 require the Review Committee to investigate the link between BJD and Crohn's as well as the potential possibility of MAP in farm produce (especially at this stage, milk)

I look forward to hearing from you and will be happy to supply you with any more information I may be able to should you require that.

Yours sincerely,

Pam McGregor

Mrs Pam McGregor, beef producer and stud cattle breeder

Enclosed - Background Information

BACKGROUND INFORMATION re National bovine Johne's disease review

This is a review of Australia's National bovine Johne's disease (BJD) Strategic Plan 2012 to 2020 which was initially scheduled for the 2015-2016 financial year. The BJD Steering Committee requested Animal Health Australia (AHA) to bring forward that planned review. The review process had seven steps outlined and the first step, a National Forum was held in Sydney on 16th February 2015 with the aim of working through the steps for implementation in February 2016.

The seven steps for the review process:

1. **National Forum** - what do we know? What is needed? Provision of initial submissions.
2. **Think Tank** - proposes a way forward.
3. **Public consultation** - submissions from community, industry and government on proposed way forward.
4. **Review of submissions** - where appropriate, submissions included into a reviewed proposal.
5. **Public consultation** - submissions from community, industry and government on second draft of the way forward.
6. **Finalisation** - Way forward presented to the BJD Steering Committee and made public.
7. **Final sign-off and implementation** - as required.

Review Terms of Reference:

- 1 Consider the:
 - 1 The effectiveness of current policies in controlling the disease at the individual farm and national level
 - 2 Impact of the disease on individual farm production and access to domestic and international markets
 - 3 Potential risks of product contamination and the access to international markets
- 2 Identify
 1. research developments that can be better utilised in the control of BJD
 2. the progress of biosecurity, quality assurance and product verification systems that could be applied to the control and management of BJD
 3. the role of industry organisations and state and federal governments in any future program.
- 3 Develop a framework for a future BJD program if deemed appropriate.

Key Goals of Australia's National BJD Strategic Plan 2012 - 2020

The National BJD Strategic Plan aims to assist the beef and dairy industries reduce the spread and impact of bovine Johne's disease in Australia.

Key goals of the plan include:

- 1 helping minimise the contamination of farms and farm products
- 2 supporting the protection of non-infected herds while minimising disruption to trade
- 3 helping reduce the social, economic and trade impact of BJD at herd, regional and national levels.

10th June 2015 Second Discussion paper:

Towards a concerted approach to the management of Johne's disease

Prepared after submissions to the first discussion paper for further consideration by community, industry and government - both papers prepared by Trudeau and Associates, Advisers to management.)

Primary Objectives:

To keep the national prevalence of BJD as low a level as possible

To do so with minimum regulation and intervention by jurisdictions within a framework that ensures as much consistency as possible between them while taking account of certain differences in practices as a function of varying priorities.

To do so while maintaining market access with minimum negative impact for those producers whose herds and properties are affected by BJD.

Ancillary Objectives:

Be as simple as possible in both concept and application - the **simplicity** principle

Be as economical as possible to (a) impellent and (b) manage over time, to minimise the financial burden to producers, industry and jurisdictions - the **cost-effectiveness** principle

Address equally the interests of those producers who wish to protect their herds and properties from incursion by the disease as well as those who seek to manage the presence of the disease in their herds or properties - the **balance** principle

Be introduced on the basis of equivalence, i.e. that a producer or property transitioning to the new system will see the current herd or property rating maintaining during the transition - the **no-disadvantage or equity** principle.

It should be noted that, in my opinion, these objectives, especially the first primary one, are contrary to the proposal that WA loses its current BJD Free Zone Status. That WA can make its own decisions regardless of what the BJD Review Committee decide is worth remembering!

Public Forum held in Perth on Tuesday 11th August 2015: An open discussion designed to receive comment from industry on BJD strategy matters in general and the second discussion paper in particular. As part of that discussion views will be sought on the four principles that should underpin the management of BJD in the future, specifically:

- 1 Treatment of references to Crohn's disease.
- 2 Consistency of approach (other diseases)
- 3 Consistency of applications (other jurisdictions)
- 4 Treatment of BJD strains (B, C and S strains)

This was attended by over 70 people, mostly WA cattle people. Prior to my attendance at that forum, I spent some considerable time downloading/reading much of the information available on the AHA website (www.animalhealthaustralia.com.au) Including the two discussion papers and subsequent submissions to each, as well as papers to increase my understanding of the disease, its management, its transmission and links to other diseases.

At the Forum, several different aspects of BJD were mentioned and recorded by facilitator Benoit Trudeau on three whiteboards. These were photographed with the commitment from Mr Duncan Rowland of AHA that these photos would be placed on the AHA website; at 2nd September 2015 that has still not happened (that I could find!).

In my recollection, possibly the main points raised during the Forum which received majority support from those attending were:

1. Retain WA's BJD Free Zone status; removal (apart from other considerations) has the potential to hugely negatively affect the export trade from WA. *(I did initiate this early in the Forum discussions.)*
2. A reliable test to detect BJD in single live animals is needed; there are tests available now but the only 100% confirmation (ie no false positives) can only be done on a dead animal.
3. Research is showing increasing evidence of a link between BJD in animals and Crohn's Disease in humans.
4. There is little if any concrete evidence that the S strain of BJD (from sheep) can be transmitted from an infected bovine to another bovine.
5. Much of the content in the Second Discussion Paper requires much clarification before decisions can be effectively made.

At the end of the Forum, we were told that the Review Committee will meet again on 29/30 September and prepare another discussion paper open for comment. No date was given for that discussion paper being available; no closing date for submissions.

Following the Forum, I have undertaken more reading and discussions with producers and have come to the following conclusions:

1. The timetable of the Review Committee (implementation of the revised plan in February 2016) must be changed - there is a huge amount of research going on around the world in various aspects of BJD which don't appear to have been properly considered thus far.
2. The BJD Free Zone status must be retained for WA at this stage; there is absolutely no valid reason put forward for changing that status at the moment, especially given the first of the three primary objectives given in the Second Discussion Paper (see enclosed background notes). It is in the national interest for WA to remain a BJD Free Zone.
3. Given that the last extensive testing for BJD in WA was carried out 12 years ago, it would seem sensible to carry out, as soon as feasible and using modern techniques available, another extensive testing process to determine the validity of that BJD Free Zone Status.
4. The link between BJD and Crohn's - that is *Mycobacterium avium* subsp *paratuberculosis* (MAP) and Crohn's Disease in humans raised by Mr Graham Nixon of New Norcia at the Perth Forum. Mr Nixon had undertaken a considerable amount of research into this issue. Since that Forum I have read about this aspect of BJD and there is no doubt at all in my opinion that there is increasing evidence of the link. There are currently eight researchers (three in Canada, one in India, one in UK, three in USA) working to increase knowledge and understanding of this.
5. There is also increasing evidence, particularly in the UK, that MAP can enter the human food chain, principally through milk with the MAP bug at times not being destroyed by pasteurisation.
6. WA's Chief Veterinary Office, Dr Michelle Rodan prepared a paper entitled National bovine Johne's disease (BJD) review: implementation options for the WA cattle industry states that there is the likely removal of WA's BJD Free Zone status and outlines three possible options. She suggests that in the first option (and in my opinion this would also apply to the other two options) BJD is likely to enter and establish in WA. Why on earth would Australia want to make that possible?

This background information (3 pages) compiled by Pam McGregor, Kojonup WA, September 2015.

