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# Submission to BJD Strategic Review February 2015.

The ABA is an Australia-wide producer representative body, currently very involved in the restructure of the grass fed cattle industry. The BJD crisis falls under an issue within the national grass fed cattle industry and warrants our full attention.

The ABA has been regularly contacted by producers who have grave concerns over the interpretation of, and management of the BJD issue in Australia, and more particularly in Queensland.

It is exactly the same concern that the ABA showed some 15 years ago when BJD came to the fore in southern Australia, and we went about the establishment of the Australian Johnes Association.

It is the same concern that saw us run an information day in Rockhampton to allay producers concerns and give out the correct information concerning the 'disease', the scientific facts, the research and the reaction (by both animals and scientists) to this research. Unfortunately on the day Rockhampton was in flood and we only spoke with about 100 producers. One of the strongest points on the day was that all the research has not been able to stop 'shedding' in treated, inoculated animals, and that the number of animals infected Australia wide was extremely small.

One of the strongest points that the ABA feels is that there is a misnomer of the BJD 'disease', and that is most definitely is not a disease so much as a syndrome. This label of a 'disease' influences perception, creates a dogma, and is a complete misnomer when it is known that all meat from animals suffering from BJD can still go into the human food chain after cooking.

Australian producers identified as being affected by BJD have had to bear the full ramification - personally, emotionally and financially - of a misnamed 'disease' that has a foot print in most of the countries of the world. This is a spore that exists in the soil worldwide, and which under the right conditions will affect some cattle within a herd. ABA believes this rate of infection nation- wide is below .001% of the national herd.

We believe the crisis is in the misinformation about the syndrome, the negative hype that is given to the syndrome by media, vets, and misplaced medical beliefs. This then leads on to an isolation of the individuals involved, and an over-reaction by other misinformed producers.

IF THIS IS A DISEASE OF ANY IMPORTANCE, WHY CAN THE COOKED MEAT OF ANY OF THESE ANIMALS ENTER INTO THE HUMAN FOOD CHAIN? AND HAS DONE SO FOR GENERATIONS!

Upon being identified, the producer then copes with the governmental fallout, the stigma, the shutdown of his business, and low prices for his stock - if those animals are stud registered stock that should command higher prices due to the expenses incurred in breeding them.

ABA was shocked at the attitude from within the Queensland Department of Agriculture that there was no problem, that these producers (namely the Kirk Family and other stud breeders) could sell their stock directly to the works for commercial values, so.." it would not financially worry them, but they just have to fix the situation on their farm!"

Apart from the obvious irony that these animals could go to an abattoir at all, there was NO understanding of the cost of breeding a registered animal as opposed to a commercial animal, and that a bare minimum of at least $2500-$3000 of costs goes into each registered animal individually. There was no understanding of the immediate loss of a substantial amount of costs.

The other irony is that the producers were told that they would not be forced to bear the cost of this outbreak, that all would be done as quickly as possible to correct both the situation and the legislation that regulates BJD in Queensland. These producers believed they would not suffer unduly, and hoped for a positive and quick resolution from their government department, trusting them.

For its part the Newman government was quoted as saying it does not expect individual producers to bear the cost of eradication program that ultimately benefits all the cattle industry.

Over the past 20+ years the grass fed cattle producers have been forced to pay the bulk of their statutory levy to MLA, Animal Health Aust, and other R&D investments. In the past 17 years this has amounted to over $2Billion in total, and almost $1Billion from the grass fed sector only.

One must ask what this money was collect for and how it was used when we see individual members of our industry being crucified (yes, we wish to use that strong word) because they correctly and responsibly reported some wastage in their cattle, when the majority of cattlemen in this country load these 'bad doers' on a truck and send them to the works, with no consequence!!

The casing point is the Kirk Family of Queensland - a respected, admired and honest family who carried out a successful cattle registered breeding business, and recognised as being at the top of the game. ABA is concerned that they are close to total business failure, due only to the stigma of a syndrome that has not effect on the human race. And due to the failure to receive any real financial or economic or veterinary help for their situation.

If they have had this syndrome in their cattle for over 30 years, why did it only come to the fore now? Why was it not be noticed as a reason not to buy Kirk cattle (by astute cattlemen).

Could it be that the syndrome came to the fore after 3 out of 4 years of tremendous wet seasons and flooding - the correct environment for BJD to be released from spores in the ground?

The amount of testing and the amount of positive samples found in the Queensland case was quite staggering as this is not a new disease and has been identified in Queensland for more than 20 years. ABA feels this just proves it is a 'situational syndrome' and should NEVER have received the importance it did.

This was very badly handled by the department, by struggling vets with a lack of understanding of the syndrome, by struggling cattle representatives who had not dealt with the 'disease' before, by the media who made the situation worse with their over-reaction and dramatic headlines, and by the complete lack of understanding by everyone which then bought about the wrong reactions and management.

For example: It had been suggested that producers should receive a premium for beef that come from regions that are not affected by BJD.!!! The fact is that BJD raises no market access problems that dairy farmers face the problem regularly but it does not affect milk sales, that Victoria sells a significant number of dairy cows overseas without BJD being a trade barrier: and that it is internationally recognised that nearly all countries have BJD.

The USA, New Zealand and Europe all have problems with BJD. In Tasmania it was recognised some time ago that would be almost impossible to eradicate the disease from sheep and cattle. Dairy producers have found that they will always have the odd cow that has BJD, and this causes no alarm, and the losses to BJD are a lot less than other more common cow health problems. WA refused to believe they had BJD with in their state, and were proven differently.

In a case many years ago, industry saw some of the bigger sheep registered studs in the south, particularly Victoria, killing off all their stock and/or destocking, only to find out that when they restocked again they still have JD in the new flocks.

This was nationally the case in Norway where the whole country destocked for over a year. However, after allowing animals back into the country from tested herds, within 15months they had the 'disease' back in their herd.

Over the last hundred years there has been research that proves that BJD has no effects on human health. As the meat is fit for human consumption after cooking, those who project the case for Crohn's Disease are being proved differently.

If Queensland remains set in its present policy on BJD, we will see producers who have small numbers of wasted stock been very reluctant to have the problem diagnosed and /or treated, fearing the consequences of stigma, quarantining or financial ruin.

The ABA believes that eradication is next to impossible and compensation should be paid to producers caught up in the BJD fiasco through no fault of their own. The ABA believes that the legislation concerning the management of BJD nation-wide (it is not a state by state issue) needs immediate reviewing, with scientific theory tested further, but also with a view to helping those already affected by this syndrome.

Unfortunately when a producer finds he has a positive test for BJD, he finds that he is on his own, and the promised compensation and state and federal government action is woefully inadequate.

The ABA have a firm view that all producers affected should be fully compensated their losses, that the losses should be assessed by someone outside the Department, as no individual should be expected to carry the financial burden for a State Government and national industry issue.

We believe this issue is manageable within industry for industry.

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**Submission to BJD Strategic Review 16/2/2015**

The Australian Brahman Breeders Association has been provided with a copy of the submission made by the Australian Registered Cattle Breeders Assoc. We fully support the statements and recommendations contained in that submission.

This submission will therefore deal with other aspects of BJD management.

The Australian Brahman Breeders Association has over 1000 stud members throughout Australia with over 80% being in Queensland.

Prior to the detection of Johnes disease at Rockley in 2012 few if any of our members, Qld commercial producers, veterinary practitioners and in many cases departmental officers had any understanding of the risks posed by JD and the impacts of quarantine associated with the Qld Protected status.

The decision by the Kirk family from Rockley to make their situation public (against the advice of many including people connected with the national BJD programme) changed the way the Queensland industry viewed BJD and the impact of quarantine on peoples livelihoods, physical and mental health became clear.

**Additional points for consideration**

- The response to Rockley Qld 2012 incident was that over 170 herds were quarantined in Qld, as well as herds in NSW, NT and WA
- After the slaughter of over 500 trace forward animals and over 14,000 faecal tests 5 infected animals have been found (2 born pre 2005) and no lateral infection detected
- Total costs run into tens of millions of dollars shared between Government and quarantined producers
- The financial assistance provided by the Queensland Government was welcome but did not go anywhere near covering all costs and losses
- If Protected area status has a value it must be paid for by all industry not just the people impacted by quarantine to keep it in place
- Costs of quarantine are out of proportion with economic losses associated with the disease
- Losses associated with quarantine including consequential losses can occur within a relatively short time depending on the production cycle
- The impacts of quarantine are particularly severe on cattle producers trading store cattle, particularly those supplying export markets
- Producers are more fearful of quarantine than they are of BJD
- The requirement for animals entering WA to come from check tested herds has seen very few stud herds check tested
- Most are reluctant to test because of the fear of putting their clients into quarantine if they test positive

- Many people are reluctant to buy from check tested herds because they fear they may come up with a positive at a future test
- Bison strain was identified as the cause of the Sarina infection in 2011
- The same Bison strain was identified as the cause of Rockley Qld 2012 infection
- A different Bison strain was identified as the cause of the Hollins Bay Qld 2013 infection
- There was no connection between the Sarina, Rockley and Hollins Bay infections
- The point of infection for all three has never been established
- The most likely cause of the Rockley infection was a bull imported from the USA in 1982 which came to Rockley in 1989
- The infection certainly did not arrive at Rockley with their first bag of NLIS tags in 2005 which was taken as the point for quarantining trace forward herds
- There are many inconsistencies in the SDR & Gs, their interpretation and assessment of risk
- It would appear that if it looks good on paper it will be good enough and it is practically impossible to do anything else with the present testing technology
- The northern Australian cattle industry because of the environment will always have a low prevalence of JD irrespective of a regulated or non-regulated approach
- The costs of quarantine of trace forward properties to find little or no infection cannot be justified
- It is unlikely suspect JD cases will ever be voluntarily reported in the future

**Recommendations**

- That Johnes disease is deregulated and becomes an on farm biosecurity responsibility
- A National Cattle Health statement which clearly identifies JD risks from C, B & S strain be universally available with a higher degree of accountability than at present
- If regulatory control is to continue affected producers must be fully compensated for losses sustained on behalf of the industry including consequential losses
- Should JD be deregulated, a National Biosecurity Fund which would assist producers who become infected to eradicate JD should be considered as it would provide an incentive to reduce the prevalence of infection

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# ANIMAL HEALTH COMMITTEE [1]POSITION STATEMENT (FEBRUARY 2015) NATIONAL BOVINE JOHNES DISEASE PROGRAM REVIEW

Animal Health Committee has considered the national bovine Johnes disease (BJD) management program and agreed that:

- The epidemiology of BJD and limitations associated with currently available diagnostic tests present considerable challenges for the implementation of regulatory/control and assurance programs.

- The complexity of the national BJD Standard, Definitions, Rules and Guidelines (SDR&Gs), National Cattle Health Statement, Beef Only scheme, National Dairy BJD Dairy Assurance Score, Australian Johne's Disease Market Assurance Program (JDMAP) and other available risk management tools has impacted negatively on producer uptake and engagement.

- Surveillance to underpin the current National Johnes Disease Control Program (NJDCP) SDR&Gs recognized zones (Free and Protected) and Beef Protected Area is difficult to achieve due to both technical and compliance issues and has not been undertaken at a level that provides adequate confidence in the prevalence claims made for the respective zones or areas.
    - The current SDR&Gs allow risk based movement between zones/areas based on prevalence of *Mycobacterium paratuberculosis* to underpin the status.
    - The recent detection of two independent outbreaks of BJD in northern Australia that have been present for many years has highlighted the difficulties with appropriate surveillance.

- Regulated management of BJD for production reasons alone has not been demonstrated to have a positive cost benefit in other countries.

- Business risks associated with BJD include a range of factors that include but are not limited to the regulatory measures currently implemented in Australia as well as export associated risks.

- Options for future management of BJD in Australia should be considered as part of a national review and be underpinned by appropriate cost benefit analysis.

- BJD should remain a notifiable disease and state and territory authorities must maintain records and issue certification that is based on records held by authorities, properties of origin for livestock destined for export must meet the importing country requirements. This does not obligate jurisdictions to undertake regulatory measures on detections of *M. paratuberculosis*.

- The SDR&Gs specifically do not address infection in cattle due to non-cattle strains of *M.paratuberculosis*. The association between non-cattle strains and cattle disease further complicates regulation of BJD. The role of non-cattle strain in cattle must be considered as part of the national review.

- Discussion with industry stakeholders needs to occur in relation to the most appropriate future management of BJD in Australia.

[1] All AHC members, except for Queensland, have endorsed this position statement. The Queensland AHC member has advised that a Queensland policy position on the position statement cannot be provided during Queensland's current caretaker period..

**BACKGROUND**

In Australia, BJD is managed under the NJDCP which refers to SDR&Gs for the control of cattle strains of *M. paratuberculosis* in cattle, goats, deer and camelids.

The primary aim of the NJDCP is to assist the livestock industries reduce the spread and impact of Johnes disease in Australia. This is conducted through zoning, inter-zone movement controls and official disease control programs in the respective states/territories, and the voluntary JDMAP to identify, protect and promote individual herds and flocks that are objectively assessed as having a low risk of being infected.

The current BJD SDR&Gs recognise that regulatory control is considered unsuitable and counter-productive for managing BJD risk in cattle populations with moderate to high prevalence of BJD.

The BJD SDR&Gs impose regulatory control in cattle populations with low prevalence of BJD (Queensland, Western Australia, Northern Territory and beef cattle in New South Wales and South Australia).

The current National Cattle Health Statement, SDR&Gs and other available tools (eg. National Dairy BJD Assurance Score and JDMAP) are seen as extremely complex and are likely to have impacted negatively on the implementation of the NJDCP and willingness of producers to be proactive in relation to managing risks. The epidemiology of BJD and the sensitivity and specificity of diagnostic tests available can result in many years of regulatory control in low prevalence areas, particularly for trace back properties, before the property status can be resolved.

In many countries BJD is not notifiable and the control of Johnes disease is the sole responsibility of the private sector. It is managed either on an individual basis or through market assurance programs.

February 2015

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# Submission to BJD Strategic Review 16 February 2015

The Australian Registered Cattle Breeders Association is the peak body for beef cattle breed associations with just under 8000 members. Seedstock producers are the most severely impacted by the imposition of quarantine due to infection or suspected infection with Bovine Johnes Disease because they depend so heavily on selling breeding stock to stud and commercial breeders.

**Effectiveness of current polices in controlling the disease at the individual farm and national level**
There is no evidence that the current nationally agreed Bovine Johnes Disease (BJD) Control Program has reduced the incidence of infection of Australian beef cattle herds with Mycobacterium Paratuberculosis (Mptb) since it was adopted on 1 July 2012.

It is now recognised that BJD can be caused by three strains of Mptb; "C" strain, "Bison" strain or "S" strain. The three Qld BJD Index cases referred to as Sarina, Qld 2012 and Qld 2013 were all caused by the Bison strain of Mptb which was most likely introduced to Queensland with the importation of some 1000 Brahman cattle from the USA from the early 1980s to the early 1990s. There is documented evidence that more beef herds in south eastern Australia are infected with "S" strain than infected with "C" strain.

The Standard Definitions and Rules for the Management of BJD (SDR&Gs), adopted on 1 July 2012, place no obligation on jurisdictions to conduct random testing for Johnes Disease in either beef or dairy herds so the extent of infection of beef and dairy herds with "C", "B" and "S" strain is unknown.

With the spread of "S" strain to cattle the level of infection of Australian beef cattle herds with Mptb has probably increased since 1 July 2012. The high level of publicity given to the Qld 2012 and Qld 2013 infections means that reliance on herd owners reporting potentially BJD infected cattle in the Protected and Free Zones is now a very unreliable surveillance method.

**Impact of the disease on individual farm production and access to domestic and international markets.**
The Qld DAFF report (January 2014) estimated that the cost of infection with BJD for an average herd in Qld of 575 cows would be $259 pa based on 1% deaths in cull cows and a 10% reduction in slaughter weight of 5% of cull cows. By 2028 this would represent a total cost to the Qld beef industry due to lost production of $51,800. By 2043 the loss would be between $129,500 and $260,000.

A study of 109 infected herds in south eastern Australia showed a prevalence level of 2.4% at first test with only 6% of infected properties having more than one clinical case in the previous five years. This study suggests that even where BJD has been endemic in dairy herds for at least the last 50 years the economic impact on beef herds is very low. There are rare cases of intensively grazed beef herds which had much higher mortality and production losses but vaccination and changed grazing management have addressed the mortality and production losses.

**Potential risks of product contamination and access to international markets**
A suggested link between Mptb livestock and Crohn's disease in humans was first published in 1913. Despite 100 years of research there is no conclusive evidence of a link between Mptb in cattle and Crohn's disease in humans. If there is a link it must be a very weak link. Modern slaughter techniques used in Australia ensure that the risk of contamination of beef from intestinal contents is absolutely minimised.

BJD is endemic in every significant Australian export market so if a link between BJD and Crohn's disease was shown then Australia would not be disadvantaged compared to our major competitors such as the USA and Brazil in international markets.

**Research developments that can be better utilised in the control of BJD**
A more accurate test for Mptb infection in young animals would be a major step forward. While the recently introduced HT-J DNA test is a good test for detecting Mptb at the herd level it is not able to accurately test for the disease in young or recently infected cattle.

**The progress of biosecurity, quality assurance and product verification systems that could be applied to the control and management of BJD**
Johnes Disease in dairy cattle in Tasmania, Victoria, SA and NSW is managed by risk based on- farm management. The adoption of on-farm management of Mptb in beef cattle requires the adoption of good on- farm biosecurity practices. The national Livestock Biosecurity Network has excellent advisory material which could easily be applied to the management of Mptb in beef cattle.

There are strong incentives for seedstock producers to demonstrate low risk of infection with BJD. A system for describing the risk of cattle being infected with Johnes Disease is already incorporated into the National Cattle Health Statement. The BJD Market Assurance Program (MAP) provides the highest level of assurance and the Check Test system provides the next level of assurance. The MAP criteria need to be modified to recognise the impact of "S" strain. The current Zones need to be removed as they do not describe risk due to the complications of "S' strain in cattle.
The risk of introducing Mptb to a non-infected herd can be managed by the use of an updated National Cattle Health Statement as is now done by sheep breeders using the National Sheep Health Statement.

**The role of industry organisations and state and federal governments in any future program**
Cattle Council Australia has no clear policy on BJD other than to respect the sovereignty of the jurisdictions and to allocate funding to Animal Health Australia to manage the national Johnes Disease Control Program. The State Farming Organisations (SFOs) generally have a poor understanding of BJD so rely heavily on their respective state Departments of Agriculture for advice. This results in a very cumbersome process for the management of BJD in Australia.

The SDR&Gs devised by the national BJD Technical Advisory Committee were an attempt to provide a nationally agreed process of managing BJD. However, as has been demonstrated in the last 26 months, jurisdictions have simply over-ridden the SDR&Gs without consultation with the national BJD Technical Advisory Committee. Jurisdictions have followed the SDR&Gs only when it suited them.

There should be no attempt to rewrite the SDR&Gs with the associated risk based zones because it is impossible to get true national agreement. Risk based on-farm biosecurity management of Bovine Johnes Disease removes the need for SDR&Gs and greatly reduces the role of state governments and SFOs.

**Compensation**
Individual producers should not have to bear the cost of diseases eradication/control programs which ultimately benefit the whole beef industry.

Should the industry or a jurisdiction make a decision that Bovine Johnes Disease must be regulated to protect the beef export industry and/or the live export industry it is incumbent on the industry and/or the jurisdiction to provide adequate compensation to those producers whose properties are placed in quarantine due to known infection or suspected infection with BJD.

**Recommendation**
That the Australian beef industry follows the path of the dairy and sheep industries by introducing risk based on-farm biosecurity management of Bovine Johnes Disease. National deregulation of Bovine Johnes Disease in beef cattle herds would have the following advantages:

- Remove the emotional and financial stress on owners of quarantined infected or suspect herds.
- Remove the need for compensation of owners of quarantined herds
- Greatly reduce the contribution from Cattle Transaction Fees to the management of BJD
- Remove the huge financial commitment of State Governments to the Regulation of BJD
- Remove the stress on Government staff who administer the Regulation of BJD

Submission received: 29 January 2015

**Submitted by:** **John R Armstrong BVSC**
**Bowenville Qld 4404**

**The Response to the Outbreak of BJD in a Qld Brahman Stud AHA Review**

**A critique of the Northern Extensive Approach (NEA)**

**Introduction**

This submission brings to the discussion a field perspective that can arguably broaden and deepen the considerations taken into account in the conception and implementation of the Northern Extensive approach that have been thus far ignored.

The Northern Extensive Approach (NEA) as it applied to the large store breeding herds of the north was seriously flawed in a number of respects.

The risk was overestimated because it was finalised before the Index herd had been investigated. Also because relevant local factors which resulted in serious financial and social impacts on herds implicated were ignored.

The authoritarian and negative tone of its formulation and implementation undermined producer goodwill.

The use of the quarantine power was ill-considered and, as it proved, were unnecessary to achieve the objectives of the response.

A brief identification and discussion of some relevant issues.

**Environmental and Management Factors**

The foundations of the NEA were based on knowledge and experience in the southern states where BJD occurs in Dairy Herds or Beef Herds on country with a history of dairying.

The management and environment in the region treated by the NEA is the polar opposite. No account was made of how these conditions may modify risk despite previous episodes of BJD indicating lateral transmission was unlikely.

**Disease History**

The BTEC experience in the north is well documented.

The disease prevalence and eradication measures successful in BTEC in the Lower Einasleigh and Gilbert River catchments are directly relevant to the BJD NEA in that area and more broadly.

Brucellosis failed to establish in the area despite significant challenge and TB was low prevalence and showed little or no spread during the testing program.

In some of those herds there was evidence the disease reached a tipping point and may have died out. This area was never the hot bed of disease it was perceived to be in official circles.

Never the less this experience has been ignored.

Segregation by age and class, progression by separate status premise and serial destocking were effective measures that were not perfect by any means but were sufficient to cross the tipping point.

The efficiency of mustering and segregation are now light years ahead of BTEC days.

**Economic Impacts**

Specialist breeder herds rely solely on sale to the local and export markets are the most severely affected by restrictions.

Young cattle retained on the property would inevitably eventually result in an animal welfare issue due to overstocking.

Quarantine excludes these markets leaving sale to meatworks via a feedlot the only option. This is a loss making exercise.

The additional operating costs have to be funded at $300 per head and result in losses of circa $200 per head.

These costs are not acknowledged and NEA expected these and other production losses to be borne by the producer.

The cost benefit analyses of NEA were cursory and wrongly assumed store buyers would accept the constraints of quarantine but at a discounted price. They didn't.

Amazingly it was asserted that the cost to industry in the above case would be neutral as the vendor's loss would be offset by the buyer's gain.

The forced losses for an extended period caused serious financial, organisational and emotional stress.

***Implementation Issues***

*The NEA Property Disease Investigation Program documentation interprets the National Protocols rigidly and applies them inflexibly.*

*The command and communication pathways are confused and the source veterinary judgements hard to determine. Many decisions are passed down the chain beyond veterinary influence.*

*Measures successful in BTEC were acknowledged but applied without the benefit of corporate knowledge or direct experience so were misunderstood or constrained by protocols.*

*The BTEC destocking standards and segregation successful in BTEC have been distorted in NEA effectively reversing the onus of proof. Stragglers identified in inadequate Biosecurity inspections have caused status downgrade despite negative test results.*

*Practical guidelines for assessing the risk posed by unaccounted TFR bulls needs more consistency and clarity. These bulls are either dead or sold. Confidence this has been achieved requires closer supervision.*

*The oversight has not been adequate to gain confidence in station operations. In remote areas there are staff shortage, long distances to travel, inadequate funding and other competing priorities.*

*The reliance on NLIS for trace forward purpose is questionable and performance in trace back from meatworks had some significant failures.*

***Quarantine***

*The use of the quarantine power does not come without responsibilities i.e. Suspicion requires "*proof to a reasonable standard by adequate evidence having regard to the overall circumstances including the important statutory role the quarantine notice plays and the likely adverse consequences."( *SUPREME COURT OF QUEENSLAND CITATION: Mowburn Nominees & ors v Palfreyman & ors [2014] QSC 289)*

Questions for the AHA Review are:-

● Did "adequate suspicion" remain after the negative findings in Trace Forward Bulls?

● Were all the circumstances considered case by case?

● Were likely adverse consequences taken into account?

● Were informed veterinary judgements made on these issues in all cases?

● Do National Protocols for Protected Status mandate quarantine restrictions in all investigations?

● If so is this consistent with the legal opinion above?

In prospect the benefit of prolonged quarantine of commercial breeding herds over and above ongoing monitoring is marginal. In retrospect it achieved nothing as no invective TFR bulls were identified.

Given that sale cattle are destined to terminal markets, neutered and would be dead by 3 to 4 years of age it is difficult to identify what is being protected by the restrictions.

**Conclusion**

The cure was infinitely more damaging than the disease.

The NEA cannot be regarded as a success though the objective was achieved it simply confirmed the status quo at unacceptable cost.

Quarantine played no role is establishing that fact. That could have been achieved without the attendant grief. The consequences were financial hardship, in some cases extreme, only good fortune averted tragic consequences.

The authoritarian and unsympathetic approach of the BJD response has unnecessarily undermined producer goodwill to disease control. What consequences will this have for disease surveillance in the vulnerable northern areas bereft of official biosecurity personnel?

Further Issues for AHA Review:-

● Process and Transparency of BJD Policy Development.

● On-going involvement of the practicing profession in exotic and emergency disease discussion.

● Veterinary Oversight and Control . The structure of command and communication pathways.

● Loss of Corporate knowledge in the Government Veterinary Services

- Cost Benefit Analysis and Funding of emergency disease responses
- Compensation to producers for operating **and** production penalties.
- Structure of Communication pathways and down and up.
- Field Staffing levels.
- The performance of NLIS

John R Armstrong BVSC

"Carn Brea"

Bowenville Qld 4404

29th January 2015

Submission received: 2 February 2015

**Submitted by:** **Atkinson Greenvale**

**1. Lack of available financial assistance**
QRAA loan assistance should be available to those people put in Quarantine (who remain in quarantine for an extended period of time). Our application was rejected.

**2. QRAA assistance** of $100k, was given to people with quarantine, but it didn't matter if you had quarantine from 1 beast or 100 (it was the same dollar value). & it was supposed to assist with costs, such as % of cost of bulls destroyed or to put cattle in feedlot, and agent's commission etc. For us, this didn't even cover the cost of the bulls, let alone the hundreds of thousands of dollars spent looking for bulls (mustering exp.), feedlot expenses, interest re-payments on an increasing loan, etc.

**3. Lack of knowledge and support by DAFF**:
A. We experienced it first-hand. On the 3rd Dec 2012, when we were first quarantined, the Biosecurity officer issued us with a quarantine notice but had no understanding of the disease itself, nor could he answer any questions about the subject.
B. When we asked questions of our local support, they weren't able to assist. We then went up the food chain further and further to get answers only to be told we had to contact our local DAFF. Frustrating circle and it has continued throughout the past two years, a political game between the politicians and DAFF and we the grazier have been caught in the middle.
BJD quarantine was supposed to be a national standard, we were aware of actions happening in other states that we could not do, when we queried, we were met with the response of "we can't comment".

**4.** What happened to **govt Levy's** that we pay per beast, I thought that was supposed to be used in quarantine situations???

**5. Lack of consistency** between properties quarantined and suspect progeny sold prior to becoming quarantined.

**6. We are being treated by the Government and our peers as guilty until proven innocent.** We were guilty of having a beast with BJD, & we had to prove our innocence. Even to the point where we had a state employee say "you've got 57hd Rockley bulls and one will come back infected!"

# Australian Veterinary Association (AVA) submission to AHA BJD Review, January 2015

## BACKGROUND

The regulation of Bovine Johne's Disease (BJD) has been under scrutiny in recent times, particularly as a result of the discovery of multiple infected and suspect herds in Queensland. There have been calls for "deregulation" coming from various sources, with various allegations that the current system is costly and unfair – particularly as a result of quarantine notices being placed on farms where BJD is found or suspected.

Paratuberculosis is a listed disease under article 1.2.3 of the OIE Terrestrial Animal Health Code. Thus, Australia has international obligations to monitor and report on the prevalence of paratuberculosis in all species in order to access export markets. Agricultural laws in Australia are state based, but there is a nationally agreed Bovine Johne's Disease Control program (NJDCP) administered by Animal Health Australia, which includes the National Standard Definitions, Rules and Guidelines (SDRGs) – agreed rules with which all state laws must be consistent.

- AVA accepts that Australia must comply with the international obligations of the OIE Terrestrial Animal Health Code in order to ensure access to export markets.
- AVA accepts that a national framework is necessary to comply with international obligations and to avoid the complications that would arise if the states and territories all had different unrelated regulations.

## EFFECTIVENESS OF CURRENT POLICIES IN CONTROLLING THE DISEASE AT FARM AND NATIONAL LEVEL

The common SDRGs can have quite different implications for farmers. For example, in Victoria, farms with a status of INFECTED can trade freely, although there are implications for purchasers in that they will also become INFECTED if they purchase such stock. Market Assurance Programs and BJD vaccine are available to those who want it, and the day to day trade effects of BJD are left to market forces. In Queensland, farms with a SUSPECT status as a result of a traceback are immediately quarantined. A PDIP (Property Disease Investigation Plan) is created to establish the status under a set of rules defined by the Queensland DAFF, and for herds deemed SUSPECT or INFECTED a PDMP (Property Disease Management Plan) is "agreed" with DAFF to resolve the status. For suspect herds there is a minimum 2 year quarantine period.

It is noted that both the Queensland and Victorian situations are consistent with the SDRGs. It's just that AHC, on the recommendation of the CVO of Queensland has declared Queensland to be a protected zone which currently means that all animals (even those with negligible risk) on suspect and infected herds will be quarantined until the status is resolved. There have been various reviews calculating the benefits of maintaining this status for Queensland producers, and numerous reports regarding the high cost to individual farmers of prolonged periods of imposed quarantine.

- AVA has no position on whether Queensland should maintain its protected status (this is a political decision for Queenslanders) but believes that, as a general principle, where costs or losses as a result of quarantine are incurred by a few for the benefit of others, there should be reasonable compensation payable.
- AVA believes that the current system provides a disincentive for farmers to undertake testing and diagnosis. Anecdotally, this has led to under-reporting of the disease in both control and protected zones.
- AVA believes that current policies which prevent the use of BJD vaccine in protected and free zones reduce the ability of infected farms in those regions to control the spread of BJD.
- AVA believes that quarantining all animals on suspect and infected farms is unnecessary. Cattle born years before the suspected introduction of BJD to a farm, and young stock destined for slaughter at a young age represent a negligible risk of BJD spread to other farms.

## INDIVIDUAL FARM PRODUCTION AND ACCESS TO DOMESTIC AND INTERNATIONAL MARKETS

Subjecting suspect and infected farms to quarantine has been the major point of contention and dissatisfaction with the current BJD regulations. It is noted that the requirement for quarantining farms in Queensland is a result of that state wishing to maintain its "Protected" status.

It is further noted that the importing requirements of other countries with respect to BJD vary, but they do not recognize the official BJD status of a farm but rather have their own individual requirements. For example, China

requires one year's freedom from clinical BJD and BJD test freedom; Indonesia and Japan require only test freedom for breeder cattle but 5 years clinical freedom for feeder cattle and Russia requires 3 years freedom from clinical disease.

Whilst it is noted that many of the issues that have caused dissatisfaction in Queensland could be dealt with under the current rules, the current SDRGs have evolved incrementally from 1998 and it is appropriate to re-examine them. AVA does not have a fixed position on these issues but calls for a detailed examination and discussion:

- The use of quarantine: Quarantining all stock on entire farm is an appropriate strategy for controlling many infectious diseases, but seems excessive in the case of BJD in light of current knowledge. For example, older stock on a farm where a recent trace-back has been found have negligible risk of infection; and young stock – even if they are infected – represent a negligible risk of spread. AVA is of the opinion that excessive use of quarantine imposes unnecessary costs, angst and discourages disease investigation and reporting of BJD.
- The current zoning system: was developed in 1997 – before the introduction of the NLIS system – which will now better allow for the tracing of cattle between farms. Large areas of Australia remain in "protected" or "free" zones or compartments on the basis of no clinical disease history. In many cases there has been little or no surveillance (or testing) for over 15 years. Holding such a status on the basis of no testing but no disease becomes increasingly untenable over time and would be unlikely to stand up to scrutiny using modern risk assessment methods. The recent identification of sheep JD strains in cattle may also become problematic in the WA free zone.
- The current status system: Whilst it is accepted that some form of risk assessment is prudent, the current status system of INFECTED, SUSPECT etc which is based at a farm level does not usefully describe the risk of acquiring BJD at a mob or individual level. Given that these statuses are only used internally in Australia and are not recognized by our trading partners, their value in preventing BJD spread should be re-examined. With the development of NLIS and the ability to better trace individual animals, perhaps a system where animals rather than farms were assigned a risk status would be possible.
- AVA believes that the risk of "product contamination" of international markets could be reduced if a better risk assessment program were adopted nationally.
- AVA believes that stock exported under ESCAS to be slaughtered at a young age do not represent a risk of spread to other markets, and that such stock should be eligible for export provided they meet the importing country's requirements.

## RESEARCH DEVELOPMENTS THAT CAN BE BETTER UTILISED IN THE CONTROL OF BJD

- The current SDRGs do not adequately deal with recent research into paratuberculosis where such information could be used as part of a risk assessment process – for example the likelihood of spread under various climatic conditions and stocking rates; the spread of various strains of JD between and within species and the better potential tracing of cattle via NLIS that could ensure (for example) that infected but low risk stock are slaughtered at an appropriate age.
- The use of BJD vaccine in beef properties has not been evaluated sufficiently. If it is capable of reducing BJD shedding and clinical disease (as in sheep) it could prove a useful adjunct to control in suspect or infected herds.

## THE BIG PICTURE - BIOSECURITY AND DISEASE SURVEILLANCE

BJD is treated differently than other diseases that are similarly listed on the OIE Terrestrial Code (such as Leptospirosis, Theileriosis, Vibriosis) presumably because of the potential link to Crohn's disease. The general principle that different plans and regulations are required for different diseases presents an unnecessary complication to industry.

- AVA believes that all farms should have a single appropriate biosecurity plan that should encompass all appropriate diseases and pests.
- The animal health aspects of monitoring and surveillance should be carried out under the auspices of veterinarians - rural veterinarians have an important role to play in Australia's disease surveillance. Programs which provide an incentive for veterinary involvement in animal health and welfare surveillance will provide superior outcomes to the current situation, where farmers are often afraid to have sick animals examined because of potential consequences.

Submission received: 29 January 2015

**Submitted by:** **Sandra Baxendall**

Goat Veterinary Consultancies - goatvetoz

## Submission to the Johne's Disease Review, with a Special Emphasis on Goat Industries

Goats are especially vulnerable to any spread of Johne's disease as they can get either bovine Johne's disease (most commonly) but also ovine Johne's disease. In addition, goats do not show the severe diarrhoea that is a feature of this disease in cattle. Instead they just suffer from wasting, making Johne's disease easily missed or put down to poor nutrition, worms or other goat diseases that cause wasting, such as CAE or CLA. A recent study of Johne's disease in goats in Saudi Arabia found that the only consistent clinical sign was "weight loss despite apparently normal food intake" in adult goats.[i] The visible signs on post-mortem can also easily be missed in goats as was demonstrated in a study in a large US goat herd with a high incidence of Johne's disease [ii] where 120 post-mortems were conducted.

Goat farmers ability to identify Johne's disease in their own goats has been found wanting. In a study of goat herds in Norway, PCR tests for Johne's disease were performed on bulk goat milk samples. It was found that 3.3% of herds which had previous Johne's disease cases had positive PCRs, but for herds with no history of Johne's disease there was a 9.1% positive rate for PCRs.[iii] This higher level in supposedly "normal" herds indicated that the diagnosis of Johne's disease had been missed in these herds.

Johne's disease in goats also occurs in younger animals that is the case with cattle i.e. as early as 12 months.[iv] Often after the stress of first kidding can cause Johne's disease but it can also cause Caprine Arthritis Encephalitis (CAE) which is also a cause of wasting in goats. One complication is that goats with Johne's disease and therefore in poor condition, are more prone to other diseases such as pneumonia, parasitic gastro-enteritis, and digestive disorders. Thomas (1983)[v] reported two years of post-mortems of 67 goats from a large UK goat herd in the first two years of Johne's disease control, which are summarized in the table below:

| **Diagnosis** | **Number of goats affected** | **Percentage (%)** |
|---|---|---|
| Johne's disease | 19 | 28 |
| Johne's + another disease | 8 | 12 |
| Pneumonia | 8 | 12 |
| Digestive disorders e.g. entero-toxaemia, acidosis, bloat | 8 | 12 |
| Parasitic gastro-enteritis | 6 | 8 |
| Gut torsion | 3 | 4 |
| Miscellaneous | 10 | 16 |
| No diagnosis | 5 | 8 |

These characteristics of Johne's disease in goats, make the goat industries more susceptible to any increase in Johne's disease spread in the cattle industries. Also it make cattle Johne's disease control at risk if it does not also promote Johne's disease control in goats. Any spread into feral goat populations would be especially dangerous due to their ability to travel large distances, often despite fences.

The amount of Johne's disease in Australian goats is unknown. The only real data for goats is the number in the current Market Assurance Program- i.e. 30 as at 27/1/15. The technology exists for surveys to be done using milk from bulk milk tanks. When this was done in Switzerland on goat and sheep dairy farms *Mycobacterium avium* ssp. *paratuberculosis* (MAP) was found in 23% and 24% of farms respectively. Similar tests should also be done on goat & cow dairies in Australia to get a clearer picture of the incidence of Johne's disease.

The current Market Assurance Program for goats, the Goat Health Statement and the National Kid Rearing Plan need to be strongly supported and all parties (industry & government) need to promote awareness of these systems.

The current system for movements into protected areas & states like Qld is a balance between trade and risks and needs monitoring to determine if this balance is right e.g. currently steers do not need to come from an assessed herd to enter Qld from NSW, cattle from a 'beef only' herd in the beef protected area or movement area of NSW just needs to have an NVD and meat goat movements into Qld just need an NVD, Goat Health Statement and a score of 5 i.e. not known to be infected and no risk factors. Any cases of Johne's disease in protected zones need to be thoroughly traced back and rules tightened up if needed.

It is highly probable that consumers will eventually require products from Johne's disease free herds and goats will be affected as well as cattle. Consumer demand for better health & welfare for farm animals and fear of negative health effects are strong long term trends. This pressure will increase as countries like Norway eradicate Johne's disease from their goat herds. Australia needs to take a proactive stance and progress along the path of eradication. The road to eradication will not be easy, but is essential that steps continue to be made in the right direction.

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Tom Campbell
"Cluden Park"
Wandoan QLD 4419

22nd January 2015

To whom it may concern,

My name is Tom Campbell and I am submitting this on behalf of myself and my daughter, Shaydie-Jane Campbell. In November 2012 we were quarantined suspect of Bovine Johnes Disease (BJD) in our herd, from the purchase of Rockley Brahman Bulls. We were subject to herd testing as we couldn't find the bulls purchased as they had been sold previously. We commenced testing in February 2013 and at this time it was dry.

We had 200 steers in December 2012 ready to sell through Roma Sale yards. The sale of these cattle was stopped and we had no money for Christmas expenses and bills. This placed extreme mental and physical hardship on my family. The cows we were testing had to be fed hay to get enough faeces to be able to get the tests completed to the standard needed.

From there we had to go to the ANZ bank and mortgage our property 'Cluden Park' to get funds to pay bills. As we were leasing another property for our breeders, we ran into trouble paying the leases as movement of any stock could not be made, which meant we had no money. We eventually got some of our steers into a feedlot, the rest of the steers had to remain here at 'Cluden Park' and be fed, This caused all sorts of problems, not only feeding the steers which should have been sold in December, but we also were unable to work our oats ground as we still had cattle running on it.

This in turn caused problems feeding the next round of weaners as we were overstocked. Our lease property ran out and our liaison officer Chris Todd lined up a lease property at St George but when they found out we had been subject to BJD testing they wouldn't permit our cattle on their property. From there we had to run an extra 280 head of breeding cows and calves on 'Cluden Park' as we had no where to send them.

Even though we were free of BJD and out of quarantine at that stage, no one wanted to take our cattle for agistment or lease. With the drought setting in and crash in the cattle market we could not access anymore money as we had used up our overdraft with the bank towards BJD.

In March 2013 we attended a meeting held in Roma, QLD, by Minister John McVeigh and here he stated that "no one person would carry the burden of the costs of eradication by themselves, and we would all be looked after". In June 2013 we had applied for the BJD funding through QRAA but were knocked back. It took from June 2013, to October 2013, just to get any sort of response. At the end of October 2013 we were IDP drought declared as we were overstocked with no feed. I rang Jim Thompson of DAFF and pleaded with him for some funds to buy cattle feed as our cattle were dying of starvation from being overstocked. With the drought settling in and nowhere to send our breeders, we ran them on reserves and stock routes trying to keep them alive with no help from government.

The BJD quarantine and the stigma attached to it have just about destroyed our family business and our home. My son Nathan Campbell had to leave the land and go work for a contractor and my daughter Shaydie-Jane Campbell had to leave her job to come home to help and work with little to no pay. As we still have BJD debt of around $240,000 we had to go into mediation with the ANZ bank as the funds borrowed for the BJD have not been able to be repaid.

During the quarantine we ran into all sorts of problems such as Ridley's feed trucks could not enter the property that had been an under a quarantine. As fellow agriculture businesses have not been educated on BJD, it was thought that they could not set foot on the property without cleaning their boots before entering and leaving the place. Also they were worried about their car tyres etc.

We have had numerous discussions since November 2012 and in the beginning the government and cattle industry had no idea how to handle the quarantine. In this time period we were sitting around waiting for answers with no income. We were told in January 2013 that we would have to sell all our breeders as we would never be able to get out of quarantine, which we then found out not too long ago was wrong.

On closing we would like to add that this is the worst situation we have ever been in and the most badly handled legislation by McVeigh. I have yet to find any cattle producer that agrees with the quarantine which in term denies the basic rights to be able to provide for your family - plunging people into debt, destroying lines of credit, not to mention the death of 100 head of cattle with no feed.

I would also like to add that McVeigh seems to be able to change legislation to suit a better outcome for themselves and also going against cattle producers. I do feel sorry for all stud producers who are at the mercy of this quarantine issue as we have not bought a single bull since 2012 and are now only keeping home bred Mickey bulls. What this is doing is putting the cattle industry back to the 1960's when everyone kept Mickey Bulls and did not improve their herds. McVeigh says "he is protecting the 19,000 other producers but in fact, through his legislation is lining them up for a fall".

The victims of this terrible mess which they have been put in needs to be put right and can be done with nothing less than full and proper compensation not some band aid solution which does nothing to solve problems which will go on for years to come. We would have been far better off if our herd were infected by the disease, lost 2 head a year had no debt and managed the disease ourselves.

Kind Regards,
Tom Campbell

Submission received: 02 February 2015

**Submitted by:** **Peter Camp**

**Chair, Kimberley Cattlemens Association**

The Kimberley Cattleman's Association welcomes the opportunity to contribute to this Bovine Johnes Disease (BJD) forum.

While maintaining strong ties with other industry bodies, such as the Pastoralists and Graziers Association, the Kimberley Cattleman's Association is being formed to solely represent the interests of pastoral beef producers in northern Western Australia, specifically those in the Kimberley and Pilbara regions.

Australia is the only country that attempts to control and regulate BJD. Western Australia is the only jurisdiction in the world that claims a BJD Free status. The regulation required to maintain the BJD National Control Program is one of the greatest impediments to increasing the value of the northern beef industry, particularly in Western Australia. Animal Health Australia's own web-site states "Under Australian conditions, BJD usually only has only a minor effect on production and health at the farm level" (Animal Health Australia, 2014), yet the costs of implementing and maintaining the various free, protected and management zones is crippling the northern beef industry.

In Western Australia to date, five properties in the Kimberley remain under movement restrictions following the import of bulls from an infected property in Queensland. 315 traced bulls have been found, slaughtered and tested. Of these, 312 tested negative to BJD shedding. One bull was confirmed infected and shedding and the impacted property is destocking at risk in contact animals. Three bull were confirmed infected but not shedding. The two remaining bulls are awaiting test results, expected in March 2015.

Herd testing to date has involved the faecal testing of nearly 2500 head of cattle across the five properties – all results were negative, it is expected that a similar number of cattle will be done this year as part of property management plans on each property.

BJD has not been shown to cause any significant production losses to beef production in northern Australia.

The extensive nature of northern beef properties render the BJD national standard definitions, rules and guidelines for managing a BJD incident almost impossible to apply. Common problems include the inability to locate all traced animals, higher mortality rates, low percentage of 'clean' musters, limited infrastructure and difficulty in adequately separating suspect animals.

This, coupled with unreliable and insensitive testing methods results in properties remaining under quarantine for many years in order to prove there is no BJD in the herd. The costs associated with a property remaining in quarantine are prohibitive, to the point where businesses simply will not have the capacity to absorb the expense and foregone income, resulting in eventual economic failure.

This is despite the fact that beef cattle have been shown to be far more resistant to BJD than dairy cattle and that environmental conditions in northern Australia are not conducive to the survival and spread of the bacteria which causes BJD.

This then begs the question – if BJD is a significant disease within the dairy industry, surely it would be best addressed by initiating an industry driven voluntary assurance program?

BJD has a minimal impact on beef herd production and presents no discernible barriers to trade. In 2013 Australia exported almost 80,000 dairy cows, 60,000 of which went to China (MLA 2014). BJD is far more prevalent in dairy herds than beef herds.

Cattle from Victoria, where BJD is endemic, are regularly exported to BJD sensitive markets as long as a Property of Origin Certificate and blood test are supplied. In fact the majority of markets stipulate that a property need only be free of clinical BJD signs for the last five years. It should be noted, that despite the extensive testing and culling programs conducted to date, there have been zero cases of clinical BJD reported in northern Australia.

State government issued Property of Origin Certificates will still be required to export cattle to BJD sensitive markets. Rather than impose costly and inefficient regulatory controls, a more practical and useful approach would be to adopt an industry driven voluntary assurance program. This strategy is already successful in states where BJD has been proven to be endemic.

The current BJD Control Program will inhibit the value of the beef industry for years to come. Under current legislation it is not possible to import cattle into Western Australia from Queensland unless the herd of origin has been tested and shown to be free of the disease for two to three years. This severely limits Western Australian producers' ability to source superior genetics. Considering that the bull bought today will have a direct impact in the herd for the next 15-20 years, the effects of this policy are far-reaching and long-lasting.

However, it is not just stud bulls that are affected by this misguided policy. During the prolonged drought in Queensland, a pastoralist was looking to have to sell prime heifers for around $0.30/kilo. These heifers were the result of many years of selection pressure targeting fertility, a well-known issue for *Bos indicus* cattle in the north. Despite the abundance of feed available in the Kimberley at the time it was impossible to import these heifers into Western Australia. This resulted in valuable, superior genetics being lost to the industry, a crippling loss of income for the Queensland producer and potential for an animal welfare disaster if no local market could be found.

Properties under quarantine and movement restrictions for BJD in Australia must be compensated for losses incurred and must not be forced to carry the costs of ongoing BJD control. If the beef industry wishes to retain a BJD Free status, then the industry as a whole should accept responsibility for the cost of compliance. If this is not possible, the disease should not be subject to a National Control Program.

If the National Control Program is to continue, research is needed to determine whether the BJD causing bacteria (*Mycobacterium paratuberculosis*) is capable of surviving and spreading in north Australian conditions.

A more accurate and sensitive testing method must be developed for detecting BJD. Current tests have a sensitivity rating of approximately 50% at best. This is not sufficient for adequate disease control.

The effects of diseases such as BJD need to be subjected to a full economic cost:benefit analysis and where production losses are minimal, there is no risk to human health and trade is not affected, should not be subject to a National Control Program.

# BJD NATIONAL FORUM SUBMISSION – BY J. CURLEY – BEEF & STUD CATTLE PRODUCER – QLD

1. **Effectiveness of current policies – farm and national level.**

As at 14/12/2014, 32 Qld properties were under BJD quarantine. **In 2012, 170 plus properties went into quarantine, along with 83 properties in the 2013 event** (other properties were quarantined prior to these events as well). Estimated associated costs and loss of income is up to $100,000,000, with further costs of $2.6 million being issued in Compensation by the QLD government.
Divide that figure by the number of affected producers and you have your answer to the damage inflicted by the current quarantine trading halt policy.

**In the endemic areas of Australia BJD affects <0.1% beef cattle NSW, Vic SA & Tas – cattle on average live to 7 year old**
**11 BJD positive animals were confirmed in the QLD 2012 event from 15,690 test samples - No positive results listed for the 2013 event from 3934 samples**

The Economic report by QDAFF economist Fred Chudleigh undertaken recently, in regard to the current outbreak, estimated that the annual loss in an infected beef herd of 575 cows would total $259. Based on this, the report suggested that if 5% of all Qld cattle herds became infected with BJD by 2043, the annual cost to industry would be $258,000 per year. In his Summary, he suggested "**BJD IS NOT A DISEASE OF ECONOMIC CONSEQUENCE TO PRODUCERS".** However, the interdependent review of this document (subsequently written for DAFF by Brent Finlay, former president Agforce Qld and Jonathan Hill, University of Qld Vetinary School), appears to follow current DAFF/ Animal Health Australia policy thoughts.

Economic Evaluation of Control options for the New Zealand Livestock Industries Prepared by Elizabeth Brett in 1998, found that further development of practical vaccination programs would be a better investment with wider applicability to **infected** herds than a test and cull program. Speculation of trade barriers and human health links were taken into account. An expanded Johne's disease herd classification framework was listed for category management http://www.biosecurity.govt.nz/files/pests/johnes/johnes-economic-evaluation.pdf. In the reports we have from NZ it is very clear that in a situation where there is a pretty high prevalence of infected flocks and herds, the Veterinary hierarchy decided that there wasn't enough compelling reason to believe that a control program such as implemented in Australia, was likely to improve the situation.

The Canadian Voluntary Johne's Disease Control Program was developed and proposed by the Canadian Animal Health Coalition (2006) was not taken up. Points of note; (a) 9.8-43.1% of the Canadian Diary population was Infected by BJD in 2012 (b) Eradication of MAP infection in Canadian Cattle herds not realistic within the next 20 years (c) Herd eradication of BJD may be possible but cost may be prohibitive. The focus must be on prevention of new infection through application of Best Management Practice suited to reducing infection rates on the farm. A follow-up project (2008-9) developed guidelines for the national coordination of provincially delivered JD control programs and initiated a plan for moving forward. - **JD prevention in Canada is a targeted management assistance approach, not a regulatory program**

Their Review of the USA and Australian programs so far. Currently the progress has been less than anticipated due to the high costs of testing challenges. In summary we need to keep things simple – minimize paperwork – work on minimum penalties (no quarantine process). Test and cull programs do not lead to increased participation or a reduced prevalence in disease. Testing is least emphasized.

**An Update on the Alberta Johne's Disease Initiative – Their Program Philosophy**: - Industry driven: Voluntary: Awareness: Education: Risk Assessment. Their review states of International Experience: Netherlands and Australia have not experienced the expected progress and are refocusing on: Risk management: User friendliness: Moving towards being less "costly" to the Producers (http://www.johnesdisease.org/Nat%27l%20Johne%27s%20Working%20Group/Proceedings/2006/USAHA%20NJWG_%20Meeting/Thursday/Afternoon/Hendrick,%20Steve.pdf).

**TAKE HOME MESSAGE:** I would suggest that Australia's BJD community experts think hard about the findings of this "review of our policy". Our current "big stick" quarantine penalty program has been shown not to work for producers in other countries and accordingly they have moved on to helpful voluntary policy without quarantine and penalty. Note that prevalence of BJD is within the dairy industry not the beef industry, which is currently severely penalised in Australia.

2. **Impact of the disease on individual farm production and access to domestic & international markets.**

Impact of a 3 month quarantine from November 2012 to February 2013. The strategic timing of a quarantine notice will be different for each scenario, dependant upon the type of cattle business, the climatic conditions, and market values.
Our trace forward quarantine came at a time of drought and poor commodity prices. Our losses from this 3 month event until purchased cattle had been slaughtered and proven BJD Free are estimated at a minimum $500,000. Ongoing production losses could bring it up to $700,000 or more. We have been able to claim a % of the culled stock $14,850, and $8,000 compensation, which has now been raised to a maximum level of $20,000. The mental anguish of dealing with quarantined stud livestock during a drought situation is quite indescribable. The trading stigma involved with this trace forward quarantine which ultimately proved clear may still affect our business. This is the damage for just one family business from current trace forward quarantine legislation.

The current known impacts have been sufficient for producers to sue the Qld Government – **and win their case.**

Advantages appear to be NIL and legislation has created further division for interstate trade with WA.

The international trade in beef should not be severely impacted by BJD. Our trading partners have BJD in their own herds and under the rules governing the World Trade Organisation a country with a disease cannot deny access to meat from another country with the same disease. Export permits include BJD amongst 14 other producer-managed diseases, so the question is; "why is the department so determined to make BJD different?"

3. **Potential risks of product contamination and the access to international markets.**

Thousands of dairy heifers have been, and are still being exported live to international countries form BJD affected states without incident. This does not appear to be creating any export problems per see. Are additional BJD free markets needed to meet Australia's dairy and beef export supply? The status quo may very well be sufficient, rather than bankrupt producers over future speculation. Eligibility is currently based on property of origin certification which is sufficient.

4. **Research developments that can be better used in the control of BJD**

For BJD detection to be beef industry viable, a more accurate test for livestock, particularly animals younger than 2 years must be found. The current methods which in Australia are aligned with lengthy quarantine periods locking down beef herds, destroying business viability and creating mental health stress for producers, is not acceptable practice.

The sheer numbers of cattle involved, and the financial return, does not warrant any form of vaccination program for beef herds.

5. **The progress of biosecurity, quality assurance and product verification systems that could be applied …**

Commercial producers could look at a scheme, which would allow producers to freely access information on the status of stock from the commercial and stud sector. Development and implementation of any market assurance scheme would require very careful consideration of its expected benefits and costs. Further, an estimate of the number of producers whom the scheme would affect, and detailed analysis of the reasons why a scheme should be introduced, and who would be the major beneficiaries

6. **The role of industry organisations and state and federal government in any future program.**

If this current policy is retained and BJD retains the status of a notifiable disease controlled by AHA and DAFF quarantine legislation, full compensation for losses must be made to all of those affected in the future. Full compensation should also be paid to those who have already suffered income and production losses.
As per quote "the Newman Government does not expect individual producers to bear the cost of eradication programs that ultimately benefit all of the cattle industry". Cattle Council of Australia and AGFORCE are industry representation to government as the voice for the "vast majority of the beef industry". Unfortunately these bodies appear not to be liaising with the majority of beef producers to be qualified to make these decisions on

our behalf. The actual % of beef producers who are Agforce members is unknown, and has not been divulged by AGFORCE. Other beef producers would have to be under the representation of CCA, who to my knowledge have not sought the advice or experience of many producers involved in the current outbreak.
On such an important industry issue a state referendum of every beef producer in Australia (via agricultural return) should be undertaken as to the best path forward. The legislative/quarantine options on such a referendum must be clearly stated and agreed upon by a beef industry/trade committee. This is true of any democratic approach concerning more than one person. The role of government and AHA should be to facilitate the outcome, and pay for any advocated government control.

**7. Develop a framework for a future BJD program if deemed appropriate.**

"Imposition of official trade restrictions of infected herds was not found to be helpful in endemically infected areas in Australia as it increased the economic and social impact of being classified as infected. Trade restrictions are now being actively removed from the Australian Programme and replaced by transparent risk-based trading supported by an appropriate herd classification system." From A review of bovine Johne's disease control activities in 6 endemically infected countries:

Australia currently has the most onerous external auditing compliance, and the only country with a whole herd destocking policy. With Biennial testing required for dairy herds (AND BEEF HERDS WITH DAIRY CONTACT – introduction of any 1st and 2nd cross dairy breeds) within Beef Protected/Management zones to be classified as low risk. This will force beef producers with any dairy genetics in protected zones such as QLD to test up to 300 cattle by ELISA/follow up faecal culture on positives (of which there can be many false positives creating trading halts for producers) This additional rule would appear to be ramping up the quarantine and testing legislation, an unnecessary penalty mentality, which has been shown to be globally unsuccessful. Considering Australia has also had the worst global farm gate beef prices, our beef producers cannot sustain uncompensated quarantine procedures.
http://www.sciencedirect.com/science/article/pii/S0167587714002013

**A framework of accountable, robust Herd Health Statements that align with transparent risk based trading needs to be established for beef producers.**

**Finally, will Australia's BJD heavy-handed legislation become a standoff between job/litigation losses in the government sector and bankruptcy of livestock farming enterprises? A change from the current AHA QLD BJD legislation to transparent risk based trading is a win win situation for all parties including the Gross National Product.**

This submission has been written on behalf of 'Queensland Bull Suppliers' - a group of stud cattle breeders who have been selling paddock bulls to Western Australia since 1997. Queensland Bull Suppliers has been conducting the Fitzroy Crossing Bull Sale to expand our market opportunities further into this region. Our businesses have been structured around servicing the pastoral regions of WA and a substantial proportion of our income is derived from this market. WA is declared free of Bovine Johne's disease and in order to meet import protocol requirements each Stud has had to undergo herd testing. We are now into our third year of testing with no positive reactors to BJD from any of our Stud herds. This application is being submitted to support policy in favour of eradicating BJD and maintaining Qld's favourable status in the protected zone.

- The Qld protected zone needs urgent surveillance testing/mapping to determine how widespread the disease is in the state. Effective control/eradication policy will be impossible to implement without knowing how widespread the disease is in QLD. It should be noted that the current outbreaks in Qld have been isolated and unrelated.

- We are concerned about the level of control over, and monitoring of, cattle entering QLD from infected zones. Notably, beef cattle moving from NSW and Victoria without any BJD screening or lifetime traceability checks. Both are requirements for entry of Qld cattle into WA.

- Our group has shown a commitment to maintaining markets by conducting herd testing when there was considerable personal and industry pressure not to do so. However, moving forward our breeder group needs a target to meet. Otherwise herd testing becomes a year in year out process at considerable cost

- Removal of movement restrictions on properties known to be infected would result in further spread of BJD - a notifiable disease having impacts both at the production level on farm and on trade access domestically and overseas.

- Compensation for effected parties is important as no individual producer should have to carry burden of the entire industry. However, as the PCR faecal test becomes more robust for detecting infected herds, other countries are implementing BJD eradication program's including Japan – a major trading partner. Increased consumer awareness and sensitivity to food safety and security means that we need to remain vigilant with regard to any potential threat. Should hypothesised links between BJD in cattle and Chrohns disease in humans be realised, the consumer backlash would have implications for the cattle industry which outweigh concerns regarding compensation.

The loss of Queensland's favourable status as a protected zone will directly affect the viability of our businesses. We believe that a proactive approach is required at both the industry and government level which are aimed at containing and ultimately eradicating BJD.

Dr Andre Cirone BVSc MVS
Operations Manager – Veterinarian
Frontier International Agri P/L

23/03/2015

Dear AHC,

Frontier International Agri is majority owned company of Ruralco Holdings Ltd, one of Australia's leading agribusinesses.

The current BJD management policy review is of particular importance to Frontier, being a licensed exporter of livestock.

Frontier's primary interest being in live export, however, as a product of live export, we also undertake some minor domestic trading of livestock, and we understand the complexities of BJD epidemiology, management and control, and how this impacts on our own supply chains for effective domestic and international trading.

Our experience is that current BJD management and control policies are essentially a mechanism to facilitate trade, and meet the expectations of trading partners, whether they are domestic or international, for live or boxed product.

FIA's view on the final outcome for any revised policy making for BJD management, is based on this principle, and any new policy, must include the following key components PRIOR to going live;

- Nationally consistent policy adopted by all states and territories
    - Must be as simple as possible, and science based
    - Should promote testing/control rather than drive JD risk underground – ie. not punish producers for testing/identifying positive animals
    - If control programs include mandatory culling, then suitable compensation, and rapid action plans developed, to deal with the confirmed cases
    - Clear policy definitions that determine what test results constitutes farm of origin infected status (ie. Serological, PCR, culture etc)
- Must not impact in our ability to trade domestically or internationally, for live or boxed product (incl. dairy etc), with no increase in mandatory/protocol testing for livestock
- MUST free up livestock movements destined for export markets across all state borders (currently it is extremely difficult and/or expensive to move cattle into WA for export)
- View to review and commit resources and funding to develop better JD testing methodologies
- Ensure that trading conditions (import country requirements) reflect modern strategies for BJD control, ie. Preference for JD vaccinates over test negative animals (due to poor current test methodologies and test performances)

FIA do not have a strong view, for or against BJD deregulation, but rather support any future program that encourages trade, and takes into consideration all aspects of trade impact, prior to any final program policy being implemented.

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MARKET ACCESS (IMPORT COUNTRY REQURIEMENTS AND STATE VET OFFICIAL PROPERTY CLEARANCES)

Currently, BJD is required to be notifiable to State veterinary/agricultural departments, in order to meet many import country requirements.

These import country requirements (ICR) often have an agreed 'basis of certification', and for BJD (and any other notifiable disease) this is currently based on official State Veterinary Department records for disease laboratory testing, and private/state veterinarian disease investigations (clinical, serological, microbiological and direct skin testing/post mortem evaluation).

Any BJD policy that results in deregulation, or BJD becoming non-notifiable, will definitely have unintended consequences in how the DA certifies to some clauses.

The DA will be required to update its trading partners, and renegotiate some protocols where the understanding that BJD is under Australian government official/notifiable control and reflect a change in the lowering of the status for how Australia manages BJD (refer to Dr Mark Schipp's CVO submission on ICR with reference to BJD clauses).

Removing the formal notifiable disease status for BJD, as a result of any proposed deregulation, must be carefully considered and planned for to ensure we do not impact market access for any significant market, or result in extra testing for the BJD sensitive markets (ie. Indonesia, Japan etc).

Examples of current Import Country Requirement's disease statements for BJD that will be affected by deregulation/non notifiable status to BJD include;

- The Indonesia feeder cattle protocol requires a property that has been '*free from clinical evidence of bovine Johne's disease*' and declared to Indonesia in the basis of certification that the '*department issues certification based on a declaration from the State or Territory Veterinary authorities*' for this notifiable disease.
- The Taiwan breeder cattle protocol requires that cattle come from properties that are '*within the jurisdiction of state or territory government authorities who maintain surveillance for notifiable diseases…*' for Johne's disease.
- The breeding cattle protocol to China requires cattle to come from a 'farms where there have been no clinical cases of… paratuberculosis for the past 1 year', and that the Department '*issues certification based on a declaration from the State Government Department of Primary Industries or Department of Agriculture of no reports of the relevant notifiable diseases on the property of origin for the relevant time period'.*

Currently a change in status for BJD from notifiable, with a high degree of government regulation and control, to a non-notifiable disease status, based on vendor/producer declarations, will result in the Australian government needing to inform trading partners of this reduced official 'control', and potentially renegotiate protocols, with the risk to increasing testing and cost compliance.

FIA support any proposed changes as indicated, but request that these changes are made concurrently with successfully negotiated protocols, that reflect any proposed change BUT do not result in any extra testing over and above existing requirements.

Andre Cirone

# Submission to BJD Strategic Review 16 February 2015
# By John Gunthorpe, BJD Action Group

Seedstock and commercial cattle producers across Australia are being visited by government employees with quarantine notices for their properties because they are recorded on the NLIS database as having purchased stock from properties having animals infected with Mycobacterium Paratuberculosis (Mptb).

Unfortunately this happened as many were moving into a heavy drought period and so their financial situation worsened because of the double impact on their business lives. Agistment was difficult to find because of their "suspect" status and feed became more expensive. Cattle prices were depressed because of the drought even though record prices were being paid for beef in our export markets. They were caught in the perfect storm.

This position was made more intolerable by the difficulties experienced by those entrusted with the responsibility of managing the quarantine process in knowing how to perform their role and advise the "suspect" property owners. Conflict and indecision caused mistrust and lack of confidence.

**Compensation**

While we understand that this process is about finding ways to move forward, those responsible for inflicting the SDR&Gs on our industry must take responsibility for the damage caused in their misguided vigour to achieve the unattainable. AHA, CCA, SFOs and State Governments must be prepared to find the funds required to fairly compensate those suffering financial hardship from the operation of the SDR&Gs.

At the time of announcing the plans to eradicate BJD in Queensland in a joint statement Premier Newman and Minister McVeigh stated –

"That's why my government is kick-starting an assistance program – the Queensland Cattle Industry Biosecurity Fund – with a $2 million grant and a loan of up to $3 million to be matched dollar-for-dollar by cattle producers through an industry levy."

And again the words repeated so many times since – "The Newman Government does not expect individual producers to bear the cost of eradication programs that ultimately benefit all in the cattle industry."

There is no industry levy in Queensland even though they exist in other states and the compensation provided by the Newman Government is woefully inadequate. Producers affected have gone to the wall while bearing the cost of eradication programs claimed to ultimately benefit all in the cattle industry.

Equally any future scheme must include a method to compensate those directly impacted by the decisions taken to manage the disease. Industry groups' failure to contribute financially to a fund to compensate those affected by BJD regulation is the clearest indicator of industry support for BJD regulations.

**Market Access**

Those pressing for continuation of the current SDR&Gs and the pain they inflict on innocent parties want to say they are doing it to improve market access. Nothing could be further from the truth. As we have documented many times in the past, beef (including offal and by-products) is unaffected by BJD and its local and international trade is assured. The suggestion by Terry Ryan from Minister McVeigh's office that there could be premiums available in Japan in the future because of the Protection Zone status is ridiculous.

Under live trade protocols all properties in Queensland are allowed to trade cattle into Indonesia other than the 3 properties that have had clinical cases of BJD in the past five years. In fact the major impediment to live trade is the issuance of the quarantine notices which incarcerate the cattle on the property other than to slaughter.

The only example the Queensland CVO was able to provide when asked about this issue was the trade of cattle from Protection Zone into the Free Zone. They are required to do a check test but other areas need to be in MAP and MN2 or MN3.

There are no market access issues and the argument is emotive and prosecuted to gain support from those who struggle to understand BJD which has a complicated disease pathway.

**Spread**

After all the costs and efforts by those charged with the responsibility of enacting the SDR&Gs and over the two years since Rockley innocently called in their vet to 3 sick cows, there have been more than 20,000 tests on in-contact cows from over 50 herds and **no evidence of spread of BJD.** This is all the more remarkable given that Rockley have most probably been infected for more than 20 years and sold several thousand head of cattle.

Queensland has 8 known infected properties out of 19,000 and less than 1% of these 19,000 have been tested. We understand that 5 of the 8 have known high risk movement from NSW and Victorian herds. 3 of the 8 include Sarina 2011, Rockley 2012 and Hollins Bay 2013. The number of clinical cases in the last 5 years is less than 10 and this makes the detected incidence of BJD in the Protected Zone negligible.

**"Cattle Producers with Low Risk of BJD Need Support"**

Economic analysis by Fred Chudleigh, Principal Agricultural Economist with the Queensland DAFF, reported in January 2014 that there would be negligible production losses if responsibility for the management of BJD was handed back to Queensland cattle producers. So cattle producers with low risk of infection from a disease that spreads slowly and has little economic impact on their business are not in need of support.

These producers are unlikely to be impacted by BJD and this is an emotive argument adopted by those prosecuting the case for eradicating BJD. Again the nature of the disease makes eradication impossible. It is endemic in many of Australia's beef and cattle trading partners and none have successfully eradicated BJD.

**Social Cost of Current SDR&Gs**

Stress often leading to depression is reported by those dealing with the daily grind of managing a quarantined property. This is both with the owners and managers of the cattle and the bureaucrats implementing the policy. These costs for the community are real and could easily double the $30 million estimate of the cost of two nodes made by the Chudleigh Report.

You will have the opportunity to read some accounts of the impact resulting in individual cases where quarantine notices were delivered. Remember none of these properties had a clinical case of BJD in their herds. The personal costs were inflicted because they had purchased a bull from a stud to improve the breeding quality of their herd. Now they are being forced back to using "micky bulls" from their own herd to avoid quarantine notices.

In designing a new approach to BJD, there must be a conscious effort to find a solution that removes these social costs. Entrusting the management of the disease to the cattle producers with education programs and inoculation for the higher risk herds would achieve this outcome.

Submission received: 17 January 2015

**Submitted by:** **Wallace Gunthorpe**
**BJD Action Coalition**
**QLD BJD Industry Advisory Committee**

I have been representing a large number of BJD quarantined producers in Queensland for the last 26 months. With the emergence of the B strain in Queensland to add to the existing C strain and now with the knowledge of trace forward S strain cattle herds the task of control is going to be much more difficult and costly if we continue down the current path.

Quarantines were issued for the trace forward properties of the 2012 detection of B strain near Rockhampton from the implementation of the NLIS system which is only about nine years of the known 30 years existence of the infection. 20 years of previous trading of this index herd has gone untested. It is not fair to destroy businesses that traded in the last nine years and ignore the previous 20 years of trading, this is not effective disease control!
The source of this infection is still not known!
There is not one lateral infection from the 2012 detection after 173 trace forward quarantines,600 perfectly healthy cattle being slaughtered and tens of thousands of tests being done costing affected producers some $70M in costs and loss of production.
With this knowledge the Queensland Agricultural minister continues to call this the biggest disease outbreak in Australian history. The disease did not spread anywhere!
The minister also promised that no individual producer would bare the cost of eradication of BJD for the greater good of the industry. He has not delivered on this promise.

The source of the 2013 detection of B strain north of Rockhampton is still also unknown!

The source of the Sarina B strain detection is still unknown!

There is the case of the Tasmanian herd that tested positive to S strain in 2014 and QDAFF had 66 bulls slaughtered in Queensland to prevent them from sale but failed to do a trace forward on the properties that had purchased nearly 700 bulls from this same herd over the last 20 years.

A property last week in southern Queensland was quarantined as a trace forward from northern NSW. This property was alerted three months ago from the agent in NSW that they would be quarantined and the minister in Queensland was notified but still nothing was done for three months.
QDAFF refer to BJD as a "serious wasting disease" but still took three months to quarantine the property. There seems to be no consistent performance on the part of QDAFF.

The case of Rockhampton Downs in the NT that were missing trace forward bulls from the 2012 incident but after a clear test on the bulls they found had their quarantine lifted. There are properties in Queensland in the same situation that had to remain in quarantine and do a herd test over a long period. The irony of the situation is that Rockhampton Downs then continued to transport cattle into Queensland while Queensland herds could not trade.

A couple at Sarina who were debt free three years ago have had two and a half years in quarantine as a trace forward from another B strain infection( source unknown).
The way these people were treated by QDAFF is a disgrace.
Their herd finally tested negative to BJD but are now $500,000 in debt and are being sold up by the bank in March. They received $26,000 in compensation.
All this through no fault of their own.

It is well known that testing is not very accurate and with people continuing to participate in the MAP program and Queensland herds doing check tests to enter WA it is only a matter of time before there is another crash.

With all this knowledge it is hard to believe QDAFF is serious about controlling BJD in Queensland, they just want it to appear that way!

The impact on farm production in a herd that is infected by BJD is very low as Fred Chudleigh QDAFF chief economist pointed out in his report.
The index property in the 2012 B strain detection believe their infection goes back to a bull imported from the USA over thirty years ago. In this thirty year period they have had five clinical cases. These costs have been minimal compared to the cost of quarantine.
In two years of quarantine their losses verified by their accountant have been $2.4M and it is ongoing. Being a seed stock producer the losses will be endless. This property received the maximum compensation allowed by the Queensland government of $100,000.

To my knowledge there is no international market that Queensland could not access if they removed the Protected Zone and became a BJD management area as we do for far more serious diseases like Lepto, Vibrio and Pesti. The current Indonesian protocol requires a declaration from the producer that they have not had a clinical case of BJD in the last five years. The only property that could not send live cattle to Indonesia under a management area would be the index herd of the 2012 detection because they have had five clinical cases in the last couple of years. Everybody else would be allowed to trade.

Potential risk of product contamination is a furphy. Our slaughtering facilities in Australia are world class and if this topic eludes to Crones disease then we must rely on the science of over 100 years that has not connected BJD to Crones disease in humans. Believe the science!

The best R and D to help control BJD is to allow producers to manage the disease on farm with the assistance of DPI. This approach will prevent the disease going underground as it will if quarantines persist.

Remove industry organisations and governments from any future BJD programs and allow producers to produce beef in farm management areas.

In summary, we need to remove quarantines for BJD at a National level and allow producers to decide where they buy their cattle. All cattle movements should be accompanied by sufficient paperwork to give the purchaser confidence in what they are buying.
If properties have a clinical case of BJD they must declare it as we do now to Indonesia.
By removing quarantines we do away with the need to compensate affected producers, we take a lot of pressure off DPI staff and most of all we don't destroy family businesses and push people to the edge.
Compensation must be paid to people affected by quarantine up to this point because they have been the scape goats for the rest of the industry. It would be good to get support for compensation from our SFO's, it has been sadly lacking in the past.

In the future if we persist with a Protected Zone policy full compensation must be paid to quarantine affected producers! If we move to on farm management of BJD there will be no need for compensation. I suggest we do not implement a policy government can't afford e.g. Protected Zone. It is morally, ethically and economically wrong to expect family businesses to carry the burden for the rest of the industry!

# Submission to Bovine Johne's Disease Review – February 2015

Prepared by: Rod Hoare MVSc, "Cadfor", Binda NSW 2583,
Farmer of the Year (Animal Biosecurity) 2012

I made a submission regarding Bovine Johne's Disease (BJD) to a similar review in October 2009. The points made then are still valid as the position is largely unchanged.

My comments in this submission are confined to the effects on the individual herd. I have been involved on all sides of this very complex issue since the 1970's. It was not until we were personally affected that I fully appreciated all aspects of being placed in quarantine.

After purchasing a new property in 2001 we needed to increase our number of breeding females. In 2001 and 2004 we bought stud cattle from a herd which was then Monitored Negative 3 (MN3) in the Market Assurance Program (MAP).

We tested our herd in November 2008 in order to enter the MAP. We had reached a stage in our breeding program where our seedstock was being sought by Murray Grey stud herds, the great majority of whom were in the MAP. To sell to these herds we also had to join the MAP.

However, when we documented the origins of our herd we were advised that the herd from which we had bought cattle had been detected with BJD in 2007. We were then classed as Suspect and placed in quarantine. Cattle, the result of 40 years of breeding, which had been in contact with the purchased cattle, were slaughtered.

It took us 3 years to obtain the MN2 status that we would have acquired in 2008 except for our purchases of the suspect cattle. The embargo on sales of high EBV cattle to stud breeders in the MAP has cost us certain sales and we suffered dearly. Furthermore the bulls sold to our commercial clients were slaughtered without compensation – these clients are loath to take the risk again. The odious reputation of being affected by BJD has not left us.

Few commercial farmers understand or act upon MAP status of herds. MAP participants are stud herds who have to be in the MAP to be able to sell to other MAP herds. Having an advantage in interstate sales is a minor benefit, even if it is the major incentive for some herds to initially join the MAP.

When advised that we were classed as a Suspect herd we were refused any information on the status or testing history of the BJD affected herd on the basis that it was confidential. We bought from a MN3 herd on the expectation that we would have a low risk of getting BJD. If this assessment was in error (and in this case grossly so) surely the affected owners and their veterinary advisors should be given an explanation and sufficient information to help them evaluate the problem.

Being in quarantine would not be very costly or inconvenient for a commercial herd but it is devastating for a stud herd. Losing seedstock business plus carrying the ongoing stigma of BJD quarantine would put the stud out of business. If a BJD case was discovered there is little chance of salvaging the herd.

If the purchase of suspect cattle is traced and notified in a reasonable time, the obvious solution would be to test and cull the affected animals promptly. If the

purchased animals are cleared of infection there would be no need to cull any other animals.

Because there was a four year delay between purchase and notification, the majority of purchased animals from the MN3 herd were not available for testing. The number of potentially affected animals was more than half our herd and virtually all the animals originating from our forty year breeding program. We were advised to use an embryo transfer program to salvage our genetics, collecting embryos from our cows prior to slaughter. The cost of this would have been crippling and time consuming. We would need to collect 100 embryos to replace our 50 females. We can carry about 50 lactating females so the project would take at least 2 years. Sourcing recipients would also be a problem. Calves born using ET cost at least $1,000 per head. To produce our 50 females would therefore cost $2,000 each or $100,000 in total and would take 4 years before the offspring would be breeding, during which time we would still be in quarantine. A friend that used ET to rid his herd of BJD estimates it cost him over $250,000.

We decided to split our herd for two reasons:

1. To act as an insurance policy in case BJD was detected. The low risk herd could be retained even if the suspect herd was slaughtered.
2. If the suspect group continued to test negative by faecal test we could move their progeny into the low risk group. In this way the numbers of seedstock of low risk could be augmented allowing us to cull the lower value suspect females as soon as possible.

However, this strategy places considerable demands on farm management and resources. Splitting the herd means we doubled the number of mobs of animals. This resulted in:

- The mob size being too small for effective utilisation of our rotationally grazed paddocks.
- Because so many of our paddocks had stock in them there was much less opportunity to “lock up’ areas for fodder conservation.
- Having two different calving groups added considerably to the time required for their supervision.
- Routine management practices such as vaccination, drenching, tagging and castration took more than twice the usual time because of split groups and having more complex yarding and movement constraints.

The split herd system was much more involved, managerially difficult and costly in terms of time and money than we imagined.

We estimate that we lost an average of $1,000 per animal, being the difference between commercial and stud prices, over our 50 cow herd for the three years we were quarantined or a total of $150,000. We received compensation of about $25,000.

If the disease was deregulated the cost in an infected herd would be limited to handling the clinically affected animals, with perhaps a maximum of 5% of cows requiring culling annually. These culls would be old cows and could be culled for many reasons at this stage of their lives. There might be some loss of salvage value of perhaps $200 per affected animal, due to weight loss of perhaps 100 kg. In a herd like ours the cost would be less than $1,000 per year.

In summary, the costs of BJD in an infected herd are minimal in comparison to the substantial costs inflicted on a herd identified as infected or suspect with the current regulated policy.

Submission received: 30 January 2015

**Submitted by:** **Darren Kent**
**Qld BJD Action Coalition**

Having been heavily affected personally as well as being part of the BJD Action Coalition with the 2012 incident in Queensland the deficiencies in the current national policy became glaringly apparent. To have any form of eradication strategy without accurate testing mechanisms defies logic, we have seen the indiscriminate slaughter of an enormous quantity of genetic material from the Q2012 incident much akin to a witch hunt from the middle-ages. Despite many arguments put to QDAFF staff regarding Embryo Transfer progeny (proven by subsequent testing to be correct) the policy seems hell bent on appearing to eradicate BJD rather than actually achieving the desired goals. At the start we were all told how no one was really quarantined only movement restrictions applied and we could still sell cattle to slaughter or send to feedlots, however on investigation, despite repeated efforts to get resolutions for feedlot protocols, no changes of any practical benefit have been forthcoming. Most feedlots find the protocols so onerous they won't consider feeding BJD suspect cattle despite the fact that all cattle are destined for slaughter from feedlots. Also there is no effort by bureaucrats to establish the levels of infection in an index herd and therefore decide on an appropriate course of action, the cost to seed stock producers affected is astronomical, the associated stigma is a hurdle many can't afford to battle to dispel, and the long term negative publicity on affected breeds is a hurdle many would blanch at.

For a disease that rates so lowly on the economic impact ladder of cattle production if it wasn't so financially debilitating, the current policy would be laughable. The disease presents no threat to meat products despite continued efforts to establish a link to Crohn's disease, all of our trading partners have the infection endemically to varying degrees and all previous attempts to eradicate the infection have failed. By definition BJD doesn't even qualify as a disease it is a bacterial infection of the gut which may or may not ever develop symptoms, and as we have seen in Qld extensive production systems obviously are not conducive to the establishment and spread of the infection. BJD HAS BEEN AND CONTINUES TO BE NOTHING MORE THAN AN INDUSTRY TO PROVIDE SECURITY TO BUREAUCRATS AND OTHER PARASITES MAKING A CAREER OUT OF OTHERS MISFORTUNE WITHOUT ECONOMIC OR MORAL JUSTIFICATION, unfortunately this is the case with a large part of commerce in Australia in 2015 and is a significant contributing factor making us uncompetitive in a world market place. If we are going to continue to regulate BJD in any shape or form radical changes to response protocols are required before any serious consideration can be given to adoption of a national response. To the people responsible for the existing policy , you already have blood on your hands , suicides , financial ruin and depression are well documented, it is long past time to front up and admit the policy is nothing but a recipe for disaster attracting nothing but negative publicity for one of our vital primary export industries.

Sincerely Yours

Darren Kent

QLD BJD Action Coalition

Submission received: 23 January 2015

**Submitted by:** **Kirk Family**
**Rockley Brahman Stud**

This submission is on behalf of Ashley, Chris and Sally Kirk who own Rockley Brahman stud in Queensland which was placed under quarantine after three of their stud cows tested positive to Bovine Johne's Disease (BJD) on November 26, 2012.

At the first clinical signs of possible BJD we voluntarily had the cows tested. We knew nothing of BJD and thought it may have been something as minor as Lantana poisoning. Our Bajool-based operation have been put through the ringer emotionally and financially.
Our entire breeding herd has had to be restarted from scratch; government promises of compensation have not been kept, and to this day the BJD situation in Queensland has not been resolved.

Personally the quarantine has had a devastating and significant impact on our family and business.
We still feel angry and frustrated, and are dumbfounded that two years on, we continue to be in quarantine!
Two years following the discovery nothing has been solved. They (Queensland Minister for Agriculture, Fisheries and Forestry John McVeigh and the state government) are never going to eradicate Johne's disease.
Policy has not changed, producers are still at risk, 98 per cent of Queensland beef herds remain untested, the source of infection (either our infection, the Sarina, or the Hollins Bay infection) remains unknown, and the compensation is woefully inadequate.
In our view the government has two options; change the flawed policy and have no future compensation for producers, or retain the policy and fully compensate producers.
I am certain that producers would not want to contribute to a biosecurity fund that will be of little benefit to them when they actually wish to make a claim.
We have been consumed by the regulations surrounding the disease and it has turned our business on its head in terms of how we envisaged running our operation.
As time goes by and more information comes to hand regarding the disease, it only highlights the need for BJD to be managed by producers.

Financially we have had our income halved due to the loss of our annual bull sales.
This has put substantial pressure on us and been a challenging and costly journey as we begin to rebuild and expand our business.
We had an independent appraisal conducted on all our cattle this year and used this to apply for compensation.
Our claim totaled $1.2 million, minus their meat works value and we are now in the process of lodging another claim for an additional $1.2 million.
To date we have received the capped amount of $100, 000 with no further discussion of receiving another cent.

We strongly believe that all those affected should be fully compensated for their losses.
I think it's grossly unfair that we should suffer the financial burden.
Affected producers are still waiting for the Newman Government to honour their statement that was made on the 18th of January 2013: "the Newman Government does not expect individual

producers to bear the cost of eradication programs that ultimately benefit all of the cattle industry".
I am unable to understand the advantage we hold in Queensland by remaining "protected" when it is endemic in other beef producing countries such as the USA, New Zealand and Europe.

In hindsight we are now able to recall a single possible case prior to that, a bull purchased from the USA who died over twenty years ago in 1991. Obviously at this time, BJD was not on our radar therefore a single case of scouring was no cause for concern. Yes, we had not done any herd testing, but neither had 98 per cent of Queensland beef producers.
As far as we are aware, nothing we've done has been identified as a contributor to the introduction of BJD that other seed stock producers are now avoiding. The disease is being driven underground.
In addition to the almost 15,000 tests conducted in Queensland there has been at least several thousand females in contact with Rockley herds tested in Western Australia, Northern Territory and New South Wales and no infection has been detected in any in-contact females aside from Hollins Bay which is a different genotype to that found at Rockley.
Unfortunately producers like us, through no fault of their own, have been caught up in this issue and have been the ones to suffer.

We need to stop the quarantining of producer's businesses.
Australian producers are more than capable of managing this insignificant disease at farm level just as they have been with diseases such as Pesti Virus and Leptospirosis.
Agforce, which guides the Minister along with other industry bodies, has chosen to focus on Queensland remaining "protected" and has lost sight of those producers who have been financially and personally affected.

As advised, we are in the process of phasing out our entire breeding herd and will do this gradually over a 10 year period.
Most people think we can just test our way out of this but we have to send all our breeders to meat works at some stage. Any cattle bred out of these suspect breeders are all bound for slaughter.

Despite all this, it is highly unlikely that there has been a spread of BJD from Rockley (only three bulls have shown to be shedding out of 789 trace forward bulls tested, and testing of at least 20 000 in-contact females in WA and QLD with no reactors).

The Market Assurance Program (MAP) is not working. Our business cannot afford to risk buying cattle from Producers that are in a MAP or doing yearly herd checks for the fear of putting our new herd back into quarantine. With the current BJD policy in place we will be selling cattle that are non-assessed, to give our buyers confidence they will not be quarantined from us.

**SUBMISSION TO THE NATIONAL BJD STRATEGIC PLAN REVIEW**

The first thing we must ask is why are we here???

There are two reasons we look seriously at an animal disease are:

Firstly, does it impact on farm profitability?

Secondly, does it impact on our ability to trade?

Johne's disease fails this basic test.

It is not like anthrax, blackleg or bloat where you can go out in the morning and find dead animals littering the paddocks.

It has minimal impact at the farm level, and as far as trade goes we are exporting record levels of meat, dairy products and live animals for breeding and slaughter.

The WTO agreements mean Johne's disease cannot be used as a trade barrier.

The real reason we are here is that the regulations are draconian and are backed at best, by third world science.

These regulations have totally ignored the social impact on honest, hard working farming families.

We need to put Johne's disease in perspective and find a way to manage this disease in a sensible and mature manner like the rest of the world.

The policy fails all the basics to run an appropriate health program: -

1. No reliable test

2. No cure – but the sheep industry has a management tool in the Gudair vaccine, we still don't have one for bovine Johne's disease

3. No proper surveys were carried out - remember WA thought they had no OJD

4. No soundly based cost benefit study that looks objectively at both the economic and social impacts, particularly on farm families.

This strategic review needs to focus upon: -

Firstly

The implications on trade - where is the evidence that this is hindering Australia's beef trade, given the WTO protocols?

How is it that the export of breeding dairy heifers from an industry where JD is endemic is continuing at near record levels?

Hard, factual and scientifically accurate evidence must be produced.

We have seen the proposers of these policies use the Crohn's disease card to support their position. They have failed as cooking meat actually kills bacteria.

Now they must demonstrate that their claims on trade are above board.

Secondly

Compensation and the economic effects of these policies on beef producers.

The Queensland premier, deputy premier and minister for agriculture all promised that no individual would carry the cost of a policy that was to benefit the industry as a whole.

They have offered a $2 million grant and a $3 million loan - yet the estimates of real losses to beef producers caught up in the Rockley affair is between $50 and $70 million.

Thirdly

The market assurance program (MAP) must be discussed at this review.

The number of herds in the program

December 2008 974

March 2014 468

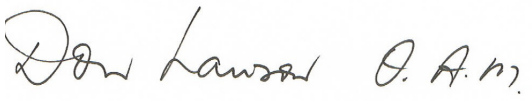
A massive 52% have dropped out. Why is this and how much has this cost to administer and what has it cost producers to be in it?

So our policy is that bovine Johne's disease should be handed back to producers to manage as per pestivirus, vibriosis and leptospirosis via risk-based trading with massive savings to both governments and producers.

That those responsible for these policies be subjected to a judicial enquiry to ensure adequate and proper compensation is paid to producers and their families who have suffered as a result of these failed and flawed policies.

That producers who are proactive in managing bovine Johne's disease are rewarded and not destroyed as is the case at present.

for the Australian Johne's alliance.



**Don Lawson OAM**
53 Hunter Street
MANSFIELD VIC 3722

0418972141

Submission received: 26 January 2015

**Submitted by:** **Geoff McInnes**
**Innesdale Angus**

To Animal Health Australia, I Geoff McInnes would like to make some comments for the review.

I believe as a Stud breeder we all need to be involved in improving the health of our cattle industry, ever since the JD programme started the veterinary section of our industry is continually learning about the complex nature of JD and how it is transmitted.

Currently the number of Stud herds involved in the programme is very low as a percentage of the total Stud industry, the reason for this is there is no incentive or bonus to be involved.

At present the participants that assist in doing the testing are the ones that are at greatest risk, if a positive occurs we can be stopped from selling breeding stock for up to 5 years, with around 80% of income from breeding stock and 20% from meat animals that obviously would put most of us out of business.

The herds not involved in the programme are not at any disadvantage as they can claim to be "Beef Only" and sell to most states and export as well.

With recent news that beef cattle can test positive for "Ovine JD" that has most western Victorian stud cattle breeders more nervous, and one I spoke to said he had left the JD programme and many more would follow, he advised me to opt out as well until testing was perceived to be accurate and penalties were far less severe.

We have been an MN3 stud herd for many years and all we have to show for it , is the cost and time to be tested and audited regularly, and having to double fence our properties from neighbours.

I hope the review can have a positive outcome as the Australian Beef industry participants work hard to produce a high quality product, often competing against countries that don't face any of the restrictions we are made to work with.

Thanking You, Yours Sincerely, Geoff McInnes

Innesdale Angus, 718 Rosedale-Heyfield Rd, WINNINDOO Vic 3858

# Submission to the BJD Strategic Review 16th February 2015
# By the Murray Grey Beef Cattle Society

We wish to strongly support the submission made by the Australian Registered Beef Cattle Association (ARCBA) to the Review on Bovine Johnes Disease (BJD). Because there is a limitation on the size of submissions to this Review we will not repeat the excellent points made succinctly by the ARCBA. We wish to elaborate on specific points that have affected our members.

The Murray Grey Beef Cattle Society is one of the major beef cattle breed associations in southern Australia representing a membership of 550 of which 250 are registered seedstock producers. Sixty six of these producers participate in the Market Assurance Program (MAP), the majority at the Monitored Negative 3 level (MN3).

We accept that Murrays Greys have had more than their share of BJD. This is not because they are more susceptible but due to the circumstances surrounding the development of the breed:

- Murray Greys were developed around the Victorian / NSW border and in close contact with dairy cattle.
- Cull dairy cows were used as foster or surrogate mothers and a proportion would have been responsible for young MG calves ingesting milk containing Mptb.
- Murray Greys were ultra-fashionable in the 1960s and 1970s and cattle moved into many new herds and transported interstate.
- Control of BJD within MG herds is difficult because many MG cows allow calves other than their own to suckle. This disrupts the vertical transmission model which is normal in herds where cows are more stringent in rejecting calves other than their own.

A number of our members have suffered after buying animals from MAP herds classed as MN3 which were subsequently diagnosed with BJD. The cost of being placed in quarantine as a suspect herd is punitive and totally out of line with the costs of actually having and managing BJD. Our members have expressed frustration on the difficulties of managing their herds when classed as suspect and placed in quarantine. No information has been provided on the situation in the herd from which suspect cattle have been purchased and this makes risk assessment and subsequent management most difficult.

Once a stud herd is placed in quarantine, either as suspect or infected, other herds are loath to buy from the herd because of the horrendous implications of being subsequently traced themselves. The anxiety and worry for producers during quarantine should not have to be endured and unfortunately 'mud sticks' regardless of the final results and the lifting of quarantine.

Our Society supports its members in attaining the highest levels of welfare and biosecurity. Having seedstock herds infected with BJD would increase the prevalence of the disease in commercial herds. Therefore the beef industry has an interest in being able to source cattle with minimal risk of diseases such as BJD. MG breeders have supported the MAP in the

past, partly to ensure they stay free of the disease and partly to allow them to sell to other stud herds in the MAP. Now that charges have been increased to participating farmers there are severe doubts whether the expenses and time taken are warranted. The costs to the voluntary individual MAP participant for testing and auditing should not have to be carried by these individuals when these programs benefit the whole beef industry. Many members are now suggesting that the Society recommends a mass exodus from the MAP unless the National policy is changed.

In essence what is being done to control BJD in beef herds? There is very little educational material promoted. The average commercial beef producer knows little about it. In areas where OJD was prevalent the beef producers want nothing to do with the beef equivalent. The MAP offers a source of potentially unaffected animals from herds tested at the stud breeders' expense. The quarantining of infected or suspect herds has created stress and financial burdens on affected farmers with insufficient compensation for their contribution to a control program that is meant to advantage the whole beef industry.

The current policy is having the direct opposite result to that desired. It is driving the problem underground. Farmers that have cattle clinically typical of BJD are advised by their veterinarians to sell or slaughter because to diagnose the disease will place them in quarantine. Vets are also saying that it is safer to buy from studs NOT in the MAP because if a MAP herd is classed at infected or suspect the tracing of stock will also place purchasers in quarantine and the purchased animals will be slaughtered without compensation.

The different requirements of State jurisdictions are a farce as evidenced by the recent Queensland debacle. After decades of declaring to NSW that they are "cleaner than thou", they had a spread of the disease which dwarfs anything seen in the NSW beef industry.

The model used in Tuberculosis and Brucellosis eradication is totally inappropriate for BJD:

- Long incubation period of BJD relative to other diseases
- No diagnostic test is sensitive and accurate at the early stages of the infection
- There are no surveys being conducted to measure the prevalence of infection or to identify affected herds.
- Low level of resources allocated – disease is not a proven zoonosis and very limited trade implications.

Sheep and dairy industries have succeeded in having Johnes Disease deregulated and the improved management programs and more open discussion about the disease are having a positive result in reducing the prevalence and cost of JD. Maintaining a regulated approach in beef cattle to reduce the amount of beef contaminated with Mptb in the food chain is farcical when a greater number of infected cull dairy cows enter the same food chain without restriction.

The Murray Grey Beef Cattle Society suggests that the beef industry would be best protected against BJD by a voluntary on-farm biosecurity standard coupled with an enhanced education program which would encourage farmers to seek advice on clinically affected animals.

Submission to BJD Strategic Review 16th Feb 2015.

Euan Murdoch, Nindooinbah Pastoral Company, Nindooinbah, Beaudesert, Qld 4285.

Adequate Compensation for producers who have been quarantined is obligated.

To quote the Queensland Government.

"The Newman Government does not expect individual producers to bear the cost of eradication programs that ultimately benefit all in the cattle industry."

Evidence is to date compensation paid has been grossly inadequate. Some quarantined properties are in the process of being sold up by their financiers/banks.

It is the Government's position this is an industry issue and should be financed by the industry. However the reality is individual producers are paying the cost of this policy. This is untenable and clearly is immoral. Adequate compensation must be paid. Irrespective of whether the government decides to continue with the current policy or change the policy fair and reasonable compensation must be paid. To ensure the compensation if fair and equitable compensation payments determinations should be undertaken by professional accounting firms to ensure the true costs of the quarantine are paid.

Compensation going forward.

The reality is it is not a matter of if further outbreaks occur but when they occur. There are a number of producers delivering large numbers of bulls to commercial producers. It is critical the Review considers a scenario of a 500 per annum bull delivery into the Queensland market and establish the true costs that would be incurred under the current regime. Cost estimates have been estimated to be between $100-$200 million.

Industry cannot afford to pay compensation at this level.

The Review should seek a confirmation and commitment from industry:

[a] That individual producers should not be forced to cover this cost?

[b] That Industry is in the position to raise these funds and how are they going to raise the funds.

If the industry cannot raise these funds then these funds will need to be provided. In the case of Queensland, by the states tax payers.

International Business.

The argument any change in policy will damage the live beef trade needs to be support by actual evidence of any damage. These claims must be supported by actual figures. Merely asserting this is the case is not a valid proposition.
The reality is the live diary trade is growing in many of the same areas we export our live beef cattle to and indications are these trade will continue to do so.

Social Costs.

Nationally BJD/OJD management has resulted in numerous bankruptcies, forced farm sales, suicides and family breakups. The total costs incurred far exceed any benefit delivered.

Where is the cost benefit analysis [incl social costs] supporting the policy

From an economic and equity perspective changing the policy is the appropriate and logical response. With the potential liability going forward this should be done urgently.

This disease should be managed ay producer level and can be done so in a far more cost effective manner.

I have made no reference to the scientific challenge that the Review will undoubtedly receive. I will leave this to more qualified members of our industry.

# BJD in NSW – NSW Farmers' Position and Recommendations

The NSW Farmers' Dairy Committee is deeply unhappy with the structure and implementation of the National Bovine Johne's Disease (BJD) Assurance Score scheme and the Australian Johne's Disease Market Assurance Program for Cattle (CattleMAP) in NSW. The current program is doing little to identify the extent of the disease or to control its spread.

Inflexible and impractical interpretations of control programs in NSW are damaging the livelihood of producers who have been a part of CattleMAP and have been found to be suspect or infected. The small number of dairy herds that are either part of the CattleMAP program or actively seeking to improve their Assurance Score reflects the strong producer dissatisfaction with the current regime.

The Committee believes that if changes can be made to the BJD Assurance Score and CattleMAP in NSW then the Committee will be able to continue to offer their support for these and for the National BJD Strategic Plan.

However, without changes, the NSW Farmers' Dairy Committee will be forced to consider withdrawing its support for the National BJD Strategic Plan and the CattleMAP program.

NSW Farmers' Dairy Committee believes that the primary failing of the current regime is that it involves far too few producers and provides strong disincentive for involvement. Therefore, the primary goal of any changes must be to increase the number of dairy (and beef) herds involved in the MAP program or actively seeking to improve their BJD Assurance Score.

NSW Farmers' Dairy Committee does not want to make any changes that will substantially impact upon beef producers in NSW or endanger the 'beef protected' status of NSW. It also understands that any low prevalence states will want to stay that way under any review of the National Program or individual state protocols.

There are three changes that the NSW Farmers' Dairy Committee would like to see made to the current management of BJD in NSW:

1. The removal of the 'trace forward' or 'trace back' provisions under both the MAP program and Assurance Score. This would mean that if a herd was found to be infected, other herds that had traded with that herd would not have their score or status automatically impacted. This would allow farmers to receive assistance to resolve suspect status using a flexible and risk-based approach that minimises disruption of trade.

2. Adoption of the provisions of the National Dairy Industry BJD Assurance Score including recognition of the contribution of calf hygiene control measures in additional 'calf points' and the introduction of an accredited Johne's Disease Calf Accreditation Program (JDCAP). This would allow complying JDCAP producers 3 extra points for the Assurance Score of relevant cattle, up to a limit of 7.

3. Greater flexibility, transparency and clarity around the implementation of control programs in NSW when a herd is found to be suspect or infected. This must include greater scope for case by case management and assessment of suspect or infected properties, taking into account individual context and farm management practices. Resolution of suspect and/or reactor status must be undertaken by faecal testing, rather than only by slaughter.

The NSW Farmers' Cattle Committee has fully endorsed the above position, emphasising that they do not want to see changes that impact on the beef protected status of NSW.

Submission received: 30 January 2015

**Submitted by:** **Nita Petersen**

## Our story

1) Put under quarantine on the 12th January 2012 for 1 Angus Bull under Low Risk was sent 22nd January 2012
2) 3 month wait for gut culture to be tested and came back NEGITIVE
3) It took QDAFF 8 months to pay the $500 compensation for the Bull
4) Then cows and calves were put under quarantine and had blood tests and faecal samples done
5) We found QDAFF's local vet inspector's competency questionable. He was unsure what needed testing and took the approach that the more testing done would look better on paper. As he said several times, he did not know what to do.
6) We told the BJD Councillor what the Vet Inspector had said and his response was "I wish he wouldn't say that in front of people"
7) We suggested that everyone involved with this issue get together to have a meeting and work out a plan on how best to resolve this situation. The BJD councillor advised us against that and said that they would not attend and advised not to speak to the other parties involved.
8) When talking to the Qld Rural Adjustment Authority they were not aware of our quarantine as they did not know of an outbreak in the Mackay area, only an outbreak in Bajool a year earlier.
9) We were then advised not to buy in females and only buy males over 6 months of age which then changed to 9 months and then to 18 months. There was no consistent message.
10) Could not understand why we were still under quarantine as all the results returned were negative.
11) Funds were running low so went to the bank which would not touch us because of the quarantine status.
12) Finally found a bank that would help us --- now we are in debt, after we moved here debt free.
13) Talked about baling hay and was told by the Vet Inspector that would not be a problem and that there were no rules regarding this. However this is not the case as we could send JD to another property if we did have it. As a result we did not bale hay.
14) Had to go out and find work off the property for both of us.
15) Was told the steers were of no concern as they would be slaughtered before they would start showing signs of the disease.
16) Then the under 18 month old steers were quarantined.
17) After the Qld Government released the $5 Million in assistance the BJD Councillor requested we do up a cash flow for a 12 month period for the Financial Advisor that he was going to bring out to meet with us.
18) Sat down with the Financial Advisor and he told us that there was no money available from the compensation funds.
19) The compensation claim that we have sent in took a long time so have called and emailed weekly to find out what was taking so long and was told most of what we had filed for would

not be claimed as it was not directly involved with the cattle but in saying that it impacted our income and these bills came from this property that was QUARANTINED. WHY????

20) Our property was quarantined due to 1 bull. However there was 1 cow missing from our former property and that place has never been put under quarantine and more than likely still alive on the property.

21) We had 1 cow test positive to the blood test and she was 13 years old and in calf but we had to slaughter her to have a gut culture done and she also came back negative we got no compensation for her at all.

22) The last 10 head that we had (5 cows and 5 steers) 3 of the cows had calves and when we sent them to slaughter we asked the Vet Inspector what do we do with the calves? Do we shoot them here in the yards? He replied he would ask his boss on what to do. The Inspector had tested these 10 head and was taking the samples back to Mackay to meet the courier. He rang us the next day and told us that he did not send the samples and we could brand up and keep the calves according to his boss.

23) We were under low risk the same as some of the Bajool cases and they had their quarantine lifted in a matter of weeks. WHY did we have 2 ½ years of it?

24) Financially we are losing! We are struggling to make ends meet as we had approx. 95% of our income taken away from us for far too long and now we could lose our livelihood. My husband has been in this industry his whole life and his family owned land for over 50 years. Now we may have to sell up because of all the mistakes that we were forced to endure.

Submission received: 30 January 2015

**Submitted by:** **David Rendell**
**Livestock Logic**

**Submission to BJD Review by David Rendell Livestock Logic 60 Portland Rd Hamilton**
**Veterinary consultant to affected BJD producers in Queensland WA NT Vic and Tasmania**

1. BJD spreads extremely slowly and has a negligible prevalence in beef herds For example
   1.1. Last two SE Australian surveys in 2000 and 2001 (see appendix 1 ) showed true prevalence of infection ~0.1% of total beef cattle and only 3%- 7% of beef herds. Has not spread much given JD has been endemic in dairy herds in the same region for most of the 20th Century
   1.2. NT , Qld and WA killed and tested 790+ Rockley bulls (another 105 faecal test only) with only 3 shedding Mptb. Tested 17,500 trace forward in contact cows in 50 herds with no evidence of any spread detected even though Rockley likely to have been infected for over 20 years during which time that have sold several thousand bulls
   1.3. South Eastern Australia study of 109 infected beef herds Larsen et al[i], average prevalence : 2.4% infected at first test , 0.8 % clinical cases annually. Only 6% of infected properties had more than one clinical case in previous 5 years
2. WA claim to freedom of BJD is flawed with OJD deregulated and endemic in WA
   2.1. Sheep (S) strain can cause disease in cattle as serious as the worst 1% of cases of Cattle strain
      2.1.1. Fahy & Ridge[ii] : a cattle herd with 2.4% annual clinical prevalence and 19% of cattle older than 15 months infected with S strain of JD.
      2.1.2. Rogers 2014[iii] Faecal culture result in herd of 1400 , 0.8% +ve S strain & 0.21% +ve C strain
   2.2. S strain now more common than Cattle (C) strain in cattle
      2.2.1. in 2014 Sergeant[iv] reported of the cattle JD cases 2003 to 2013 that were strain typed 63% were infected with S strain and 12% both S and C strain
      2.2.2. Clearly need to review National SDR & Gs which state; [v] "cross-infection between sheep and cattle in Australia is considered to be a rare event."
   2.3. Bison (B) Strain :
      2.3.1. Faecal culture of 218 Rockley cull cows, 3.2% +ve B Strain of JD. This is biased up due to selection of cull / older cows. Annual clinical prevalence of 0.7%, ( these results similar to that reported in S E Australian beef herds )[vi]
      2.3.2. Stabel 2003[vii] reported beef calves more susceptible than Bison calves to a Bison isolate. (only 6 in each group , only assessed early infection and not clear if the isolate was a Bison strain)
3. Current control programs costly
   3.1. National spend on JD management $370,000 (main cost counsellors) and research ($420,000 CCA contribution) 10 x more than all other diseases combined [viii]
   3.2. Queensland spend on response to detection of BJD at Rockley (Qld) according to DAFF [ix] ~ $15 -20 Mill [x], excluding destocking cost Hollins Bay destocking cost in order of a few million and WA & NT Rockley response has so far cost close to $10mil and $1mill respectively Thus a total spend well in excess of $30 mill on response to detection of BJD in two stud herds
   3.3. The cost of any direct effect of the disease with the Rockley outbreak < $3000 ( total ~5 clinical cases in older cows that if sold, sale value discount would be a maximum of few $hundred each)
   3.4. Qld compensation capped at $100,000 several producers individually lost > 10 x that
   3.5. Those that claim benefit from these programs, not prepared to pay for cost. No jurisdiction has ever been able to fund full compensation.
   3.6. There is no evidence of export advantage
   3.7. No evidence having an impact on prevalence
   3.8. Impediment to export as any domestic trade restrictions mean ineligible for export licence , the Millions of $ lost by Kimberly and Queensland suspect properties was due to unable to access live export and this would not occur if they were in a Management Area as suspect properties still meet Indonesia import conditions of no known infection in last 5 years.
   3.9. Free Zone restricts trading / agisting options reducing thus increasing cost of production
4. Crohn's
   4.1. first suspected link in 1913 with Crohns and Mptb no causative association confirmed
   4.2. no evidence BJD has ever had an impact on Crohn's diseases ( WA Crohns no diff to Vic)
   4.3. Prospective parallel, placebo controlled, double blind, randomised trial of 2 years combination antibiotic treatment of active Crohns Disease patients and a year follow up produced no evidence of any sustained benefit Selby et al 2007 [xi] (If Crohn's caused by a mycobacteria expect some response with 2 years treat)
   4.4. Plenty of known serious Zoonoses eg listeria salmonella Yersinia…… we don't apply Protected Zones (PZ) for
5. SDR & Gs for PZ and Free Zone (FZ) are silent on the level of monitoring required and precise level of prevalence level required. Obvious requisites to justify response of both PZ and FZ to impose "strict regulation leading to eradication" only on those detected

5.1. Where the consequences are high for imposing a regulation the level of evidence for imposing must also be high. The recent supreme court case in Queensland [xii] Paragraph 20 of the Judgement *"proof to a reasonable standard by adequate evidence having regard to the overall circumstances including the important statutory role the quarantine notice plays and the likely adverse consequences for the applicants' of issuing it".* [xiii]This precedent is in respect to civil evidence as was summarised by Neat[xiv] in the High Court "In short, the more serious the allegation, the more probative or stronger the evidence needs to be"

5.2. PZ was, up until 2012, required to have Upper 95% Confidence Level that less than one percent (1%) of herds infected with BJD.[xv] No evidence that this was complied with

5.2.1. The last published random survey of Queensland beef properties is the 1997 survey indicates an upper 95% CL of herd prevalence of around 12% :

5.2.2. 134 properties , ELISA blood test of thirty (30) mature animals per property Assuming ELISA 25% sensitivity and within herd prevalence of 2.4 % If assume Qld likely to have lower within herd prevalence due to drier climate and lower stocking density the survey indicates even higher herd prevalence at Upper 95% CL

5.3. CVO of Qld currently claims level in Qld is 0.01 %

6. Grossly inadequate evidence/monitoring of current herd prevalence

6.1. so no way of assessing

6.1.1. validity of current claims of Free or Protected status

6.1.2. measuring /comparing success of any of the various control programs

6.1.3. or fairness of application of strict regulations on those detected

6.2. 99% of Queensland herds not tested thus state is essentially deregulated

7. Comparison with Pestivirus also causes fatal wasting /diarrhoea syndrome

7.1. Table summary comparing Pestivirus and BJD

| | % infect herds | Test sensitivity | % Test Positive | | Annual Mortality | | |
|---|---|---|---|---|---|---|---|
| | | | Infect herd | Prevalence | Age (yrs) | Infect herd | Prevalence |
| BJD : SE Aust Beef | 3-7% | 25 -45% | 2.4% | 0.02 -0.04% | 4- 15 | 0.7% | 0.02-0.05% |
| Pestivirus Aust wide | 80 % | 100% | 1-1.5% | ~1%<br>20 -50X BJD | 1-2 | 0.7% | 0.6%<br>10 -30 X BJD |

7.2. The number of BJD sensitive markets is often quoted as a reason for PZ

7.2.1. None of our beef competitors internationally are free of JD.

7.2.2. Long list of endemic diseases that includes Pestivirus, Malignant Catarrhal Fever & Leptospirosis that have similar export requirements and these are not impeding live exports

7.2.3. BJD endemic in SE Australian dairy herds and Dairy products remain one of our highest export earners

7.2.4. OJD endemic in WA does not appear to be affecting live sheep trade apart from sale of stud breeding sheep (some countries won't accept blood test positive sheep and thus can't sell vaccinated sheep or infected sheep).

## 8. Conclusion

8.1. On farm management like all other cattle diseases and make vaccine available (no subsidy) for the very small % of high prevalence herds.

8.2. If persist with regulations must

8.2.1. Have producer support based on majority of farmer s willingness to contribute to a fund that provide reasonable compensation for those affected by any regulations

8.2.2. set specific targets for FZ or PZ status and robust monitoring of significant portion of all herds in the zone to ensure enforcement is applied to all fairly

8.2.3. Avoid affecting eligibility for terminal live exports

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[i] JWA Larsen, JK Webb Ware and P Kluver 2012 "*Epidemiology of bovine Johne's disease (BJD) in beef cattle herds in Australia"* Australian Veterinary Journal Volume 90, No 1–2, January/February 2012.

[ii] Fahy & Ridge 2013 "Ovine Strain of Mycobacterium *paratuberculosis* in beef cattle a case study" MLA Report P PSH 0206

[iii] Rogers et al 2014 A case study of a beef herd in Southern Australia managing endemic Johnes disease with vaccination and herd stratification AHA /CCA/ Biosecurity SA/Nat JD Program poster at Int Paratuberculosis Colloquium Italy 22-26 June 2014

[iv] Sergeant E Keating N Citer L Allen D2014 "Occurrence of sheep strain Johne's Disease in the Australian Beef Industry AHA /CCA/Nat JD Program poster Int Paratuberculosis Colloquium Italy 22-26 June 2014

[v] Page 28 8th Edit National Johne's Program BJD Standard Definitions, Rules and Guidelines for the control of cattle strains of Mycobacterium paratuberculosis in cattle and for goats, deer and camelids

[vi] Larsen et al 2012 see above

[vii] Stabel Palmer Whitlock 2003 "Immune responses after oral inoculation of weanling bison or beef calves with a bison or cattle isolate of Mycobacterium avium subspecies paratuberculosis" Journal of Wildlife Diseases 39(3) l 2003 pp 545 – 555 and also presented at the 7th International Colloquium Paratuberculosis Bilbao Spain , 11-141 June 2002 published in proceedings pp 90 -94

[viii] AHA Managment of the Nat J D Control Program 150,000 MAP Operating Costs & Audit rebates $30,000 (2/3 beef cattle) Financial & Non Financial Assistance Program (main cost counsellors) $250,000 Sydney Uni JD Research Project CCA Contribution $420,000 personal com A McDonald

[ix] Qld DAFF publication 2014 "Summary of factors and costs associated with different bovine Johne's disease management options in Qld

[xi] Selby Et al 2007 Two- Year combination antibiotic therapy with clarithromycin, rifabutin and clofazimne for Crohn's Disease : Gastroenterology 2007 Jun 2313 -

[xii] *SUPREME COURT OF QUEENSLAND CITATION: Mowburn Nominees & ors v Palfreyman & ors [2014] QSC 289*

[xiii] Cf. *Briginshaw v Briginshaw* (1938) 60 CLR 336 at 361-362.

[xiv] Neat Holdings Pty Ltd v Karajan Holdings Pty Ltd [1992] HCA 66; (1992) 110 ALR 449 at 449–50; see also R v Petroulias (No 8) [2007] NSWSC 82; (2007) 175 A Crim R 417 at [16]–[17]

[xv] Page 14, 7th Edit National Johne's Program BJD Standard Definitions, Rules and Guidelines for the control of cattle strains of *Mycobacterium paratuberculosis* in cattle and for goats, deer and camelids

## Appendix 1

1. **98 beef herds NSW, Vic & SA (**2001 survey)
   - 16,000 cattle blood tested
   - 4 confirmed positive = **0.025% true prevalence of 0.1% Test sensitivity 25%**
   - (4 diff herds 3 Nth NSW, 1 Vic)
   - True prevalence 7.2% 95% CL 2.5% - 17.3% assuming herds 500 cows and ELISA sensitivity is 25% and within herd prevalence 2% the testing 163 the herd sensitivity is 57%
2. **296 beef herd Tas** (2000 survey)
   - 19,300 cattle blood tested
   - 3 confirmed positive = **0.02%** very close to above ( all in one herd)
   - True prevalence 3% ; 95% CL 0% - 6% Assuming herd sensitivity is 29% given testing on average 163 cows with a herd of 150 cows . ELISA sensitivity is 25% and the within herd prevalence 2%.

**Appendix 2** Summary of Rockley and Hollins Bay Trace forward testing

| | Qld DAFF Rockley | Qld Daff Hollins Bay | WA DAFF Rockley | NT Rockley | NSW Rockley | total Rockley | total |
|---|---|---|---|---|---|---|---|
| TF In contact cow | 14998 | 2557 | 2500 | 0 ? | ? | 17498 | 20055 |
| TFR bulls pm sample | 334 | 58 | 293 | 90 | ? | 717 | 775 |
| TFR bulls feacal sample | 106 | 44 | 0 | | | 106 | 150 |
| Total bulls sampled | 440 | 102 | 293 | 90 | | 823 | 925 |
| No Bulls shedding | 2 | 0 | 1 | 0 | 0 | 3 | 3 |
| | | | | | % | 0.36% | 0.32% |

Rockley = Queensland 2012 incident Hollins Bay = Queensland 2013 incident

**Appendix 3** Cost of WA response

*Pers com with 3 affected producers ineligibility to export cost ~5mill +*
*Bull euthanasia replacement cost @3-5,000 and testing at $1000 ~ $1.5 -2 mill*
*Culture & Ht JD PCR 2500 cows @ $300 per pool of 5 $150,000*

Animal Health Australia
National BJD Strategic Plan Review

Spann Family
Minlacowie and Wingfield Droughtmasters
P.O. Box 19
Goovigen. Qld. 4702

29th of January 2015

We are Seed Stock and Stud Producers not directly affected by the BJD situation but we have been severely affected indirectly. We have been selling Bulls to Western Australia for nearly thirty years predominately the Kimberley region (This has been one of our major markets) and now due to the restrictions placed on Queensland unless we test we can no longer sell into WA. This is a huge loss to our business in the effect of hundreds of thousands of dollars.

We will not test due to the current regulations and the risk of putting all of our Clients in the position of potential quarantine. The test is very inaccurate and very easily manipulated and impossible to control relying on Producer integrity as has been pointed out previously to Bio Security in both Queensland and WA. Tested herds are mixing at shows, some Testing herds may be mixing on their own properties Cattle from untested herds and some testing Herds maybe just testing a small proportion of their herds and not testing all of their properties.

This situation is dividing the Stud Industry with some producers testing with obviously no regard whatsoever toward their Clients. We have put our Clients first by choosing not to test. We will not risk their businesses with the possibility of even a false positive leading to Quarantine.

The disease itself which has been pointed out by leading vets has little to no effect on production which has been proven by the 2012 B strain case where the disease had possibly been on the particular property for up to 30 years and until quarantine and recognition of the disease these Producers were able to build their Stud Business up to one of the most successful Producers of top quality Red Brahman Stud Cattle in the Country. This could never have been achieved with a serious debilitating Disease affecting Cattle on a Property for as long as 30 years or more. We ourselves would lose more cattle to snake bite each year than we would lose should we have BJD. Lepto, Vibrio and Pesti can potentially have much more impact on production and yet BJD continues to be described by the Minister for Agriculture as the biggest disease outbreak in Australian History?

Affected Producers caught up in the 2012 detection of the B strain outside of Rockhampton have collectively lost Millions of Dollars with hundreds of perfectly healthy Cattle destroyed. In some cases pushing producers to breaking point all over a very easily producer managed disease which has little to no effect on productivity.

With the government amendment of the stock regulation 1988 to include all of the JD strains including the S strain that we now know crosses over, why with the current protocols of quarantine has the government not quarantined all of the trace forward properties involved with the Tasmanian Herd that tested positive to the S strain in 2014? Bulls from this Property that were in Queensland for sale in 2014 had to be slaughtered so why has this case been treated differently?

We need to remove BJD quarantines nationally and move to an on Farm producer managed situation and do away with Government Compensation. If we continue to remain a “protected Zone” here in Queensland then affected Producers need to be fully compensated not as it has been in the past where we have seen Producers contrary to the Ministers promise bare the costs of the Government trying to eradicate the disease.

Sincerely
*The Spann Family (Minlacowie and Wingfield Droughtmasters)*
*Jambin/Goovigen Qld.*

Submission received: 18 January 2015

**Submitted by:** **John Sunderman (for the Sunderman Family)**
**Pinora Angus Stud**

SUBMISSION TO THE BJD REVUE COMMITTEE

In our submission first let me state how we came to be involved in the BJD MAP. About 15 years ago the Angus Society of Australia decided that all animals that were to be sold at the National Show and Sale in Wodonga should come from a herd entered in the MAP. We were selling bulls there at the time and entered into the JD MAP. During these last 15 years we have been tested up to MN2 standard and have stayed at MN2 for several years with the 50 cow check test every 2 years. We have been audited many times, with self audit, vet audit and outside auditor carrying these out we have never had any fault with any of our obligations with the MAP.

Our last 50 cow check was carried out in April 2014 and after a few weeks we were told we had a reactor, at this time we thought it would be a false positive as we had had one before, a faecal test was done, it came back positive and this was officially when we were notified that we had our livelihood threatened. We received a letter from DPI that informed us that we were now classified as Infected and our legal obligations under this. Three clear tests over a period of 5 years.

The letter stated that we would be assigned a Cattle Council advisor, and that we could still trade cattle provided we informed purchasers of our status. At the time we thought this was probably workable as we had talked to a few clients and they had no problems. The devil was in the detail though, it didn't matter if the clients were happy with what we were doing it turns out that as soon as they buy an animal off us they would lose there beef only status and would lose access to most markets, no sensible farmer would do this. So we were effectively quarantined with our cow herd , we have been breeding and selling stud Angus cattle for 55 years, reduced to chopper value, our annual bull sale will have to be cancelled and our clientele we have built up over 45 years of on property sales left to fend for themselves.

We have been decimated, a lifetimes work effectively reduced to a herd of choppers, because of one cow. This cow was an 8yo animal in prime condition and had been tested clean 2 years previously. The worst of it is we immediately undertook a whole herd test of all animals that were old enough to be tested, just to see how big the problem was, and the whole herd test came back clean. We are still scratching our heads we can get no answers as to how one cow could be infected and not more or as to how any of it has occurred.

Among things we are struggling to understand is how, when we were clearly doing the right thing by being in the MAP, we can be ruined when every other herd that is not involved can carry on selling to anyone. How we are left with picking up the pieces of a programme that is that flawed only a team of bureaucrats with no knowledge of farming or the cattle industry could have designed it. The people that are in it are penalised and the people who have done nothing benefit.

We have been offered $10000 in compensation to help with testing. This we believe is so low it may as well be nothing. In the first year alone the restrictions will cost us at least $200000, not even taking into account all our cows are now only worth chopper price, if the programme is to stay and we were in it for the required five years we would need to be compensated at least one million dollars. Let alone we would have no clients left after 5 years. There is not a beef producer, which relies on beef for their

income, which could stay in business with these penalties, we have some serious thinking to do in the next year as to our future in the cattle industry. I am sure even the people that designed this programme didn't intend this.

The MAP is currently unworkable, numbers in the programme have shrunk. Anyone with semblance of knowledge would have nothing to do with it, I have told everybody I know that is involved in it to get out of the scheme, now we know that the sheep strain is showing up in cattle herds on a regular basis no one will be testing. The irony of our situation is if we had tested for the sheep strain we could have kept going like nothing had happened. The MAP is as good as dead the only thing to work out is what replaces it.

Our thoughts on that are:

1. If the BJD inquiry truly believes that JD is of such national importance to the beef industry then only one option is open to them. All herds must be tested and an adequate compensation package given. No exemptions, one in all in, all strains of JD to be treated the same and everyone plays on a level playing field. This option would be a grand overkill and no one would want it.
2. If however the inquiry finds that JD is such a minor problem in the beef industry that it should be deregulated, then perhaps another line on the NVD, stating no known JD, would be appropriate. In our case we could tick this box as we have had a clear herd test and currently we have no known JD. Probably 99% of beef herds in Australia could tick this box. We believe this option would be by far the best, leave JD where it should always have been left, in the hands of the herd managers, as it is in every other country in the world with a significant beef herd.
3. Another option would be to give every beef herd a ranking out of 10. With 1 being assigned to an infected herd, 5 being assigned to a herd having a clean test or beef only and 9 given to a current MN3 herd. Herds would be able to move up and down on this scale depending on circumstances. This of course would involve more administration and paper work but it would at least give clients an indication of the herds situation and then clients could make their own decisions on there purchases. This though would leave another layer of paper work for farmers to contend with.
4. In our opinion the Beef Only designation is another regulation that is never policed and should be done away with, We have seen many times cattle that have either been run with dairy cattle or grazed on pasture that dairy cattle have grazed been sold under the Beef Only designation. If there is no one able to police this regulation why have it. It protects no one and makes honest people do things they shouldn't.

In summary we should have listened to the Johnes Alliance years ago and had nothing to do with MAP, but we thought we were doing the right thing, have we lived to regret that decision. The programme in our mind is dead and nobody will have anything to do with it. JD should be deregulated and left in the hands of the people who know best, the farmers.

Thankyou for the opportunity

John Sunderman
Pinora Angus Stud

# Paper: The need for an independent national BJD review.

## Purpose

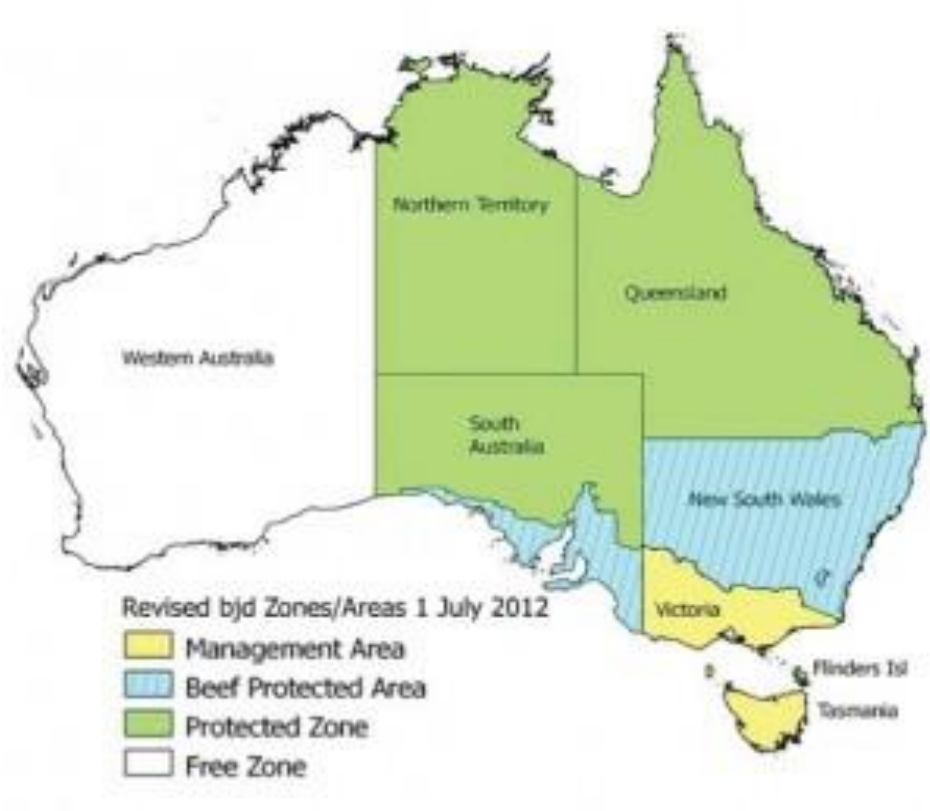
To brief Councillors on the view and recommendations of the Victorian Farmers Federation Livestock Group in relation to the current National BJD Program.

## Background / Information

**The National BJD Control program**

- Governed by Standard Definitions, Rules and Guidelines (updated 1 July 2012)
- The SDR & Gs give the Chief Veterinary Officer in each state/jurisdiction considerable flexibility

The National BJD Control Program is based on Zones believed to have different levels of the "C" strain of Johnes Disease




**Reasons given for the current National BJD Control Program?**

- To protect Australia's Beef export and live export markets
- The risk of a link being shown between Johnes Disease in livestock and Crohne's disease in humans)
- Johnes Disease causes significant economic loss to infected herds

**Effect on beef exports?**

- BJD is endemic in nearly every country including all of our major export markets.
- Under World Trade Organisation rules it is illegal to impose a trading restriction for a disease present in the importing country
- Japan could not impose trade restrictions on Australia due to BJD and not impose them on North America.

**Effect on Live Exports?**

- Tens of thousands of dairy heifers sourced from Victoria are exported to China and Japan. JD is endemic in the southern Australian dairy herd.
- Tens of thousands of beef heifers are exported from southern Australia to Russia and China. BJD is deregulated in Victoria and Tas

**The "S" strain of JD**

- The strain of JD normally found in cattle is the "C" strain
- Now the Bison strain is found in cattle
- The "S" strain is normally found in sheep but is increasingly being found in beef cattle
- "S" strain appears to behave the same way as "C" strain in cattle
- It spreads very slowly in beef herds
- It has minimal economic impact
- It does not impact on the meat export industry or the live export industry

**The cost of Regulation of BJD**

- In Queensland alone the cost of the Rockley infection and the Hollins Bay infection has been estimated at between $23mill and $25mill about equally shared between the Govt and producers (Qld DAFF Report Jan 2014)
- Does not include the cost of destocking infected herds. (another 6 million)

**The cost of the alternative of a managed approach to BJD in Qld estimated by Qld DAFF**

- By 2028 $58,000pa
- By 2043$129,500pa to $260,000pa

**The emotional toll**

- Stress on the owners of herds which are quarantined for up to five years (but mostly not infected)
- Stress on Government staff who have to manage the regulated approach to BJD

**Compensation:**

- The Queensland Premier announced the release of $2mill grant and a further $3mill to be matched dollar for dollar from industry via a "Biosecurity fund"

The rules were;

- Herd had to be in quarantine for a minimum of 6 months
- Limit of $50,000 per property (later increased to $100,000)

- As of July 2014, just $2.2 million has been paid out which included compensation for slaughtered cattle and Supply Chain Pathway Assistance.
- Includes grants of $3000 to any herd quarantined for a minimum of quarantine one month and $5000 once released from quarantine regardless of size.
- "Biosecurity levy" has not been implemented
- Rockley applied for $1.2mill compensation for stud cattle slaughtered in 2013/2014. They were paid $100,000 and told there will be no more compensation and given no compensation for losses caused by destruction of their ability to sell bulls since 2012.

**OJD in sheep**

- OJD is endemic in the Australian sheep flock including WA. OJD was deregulated in all states in 2007.
- Exports of live sheep have remained strong
- Exports of lamb and mutton are at record levels

**Links to Crohn's Disease**

Scientists have been trying to show a link between Johnes Disease and Crohnes Disease in humans for over 100 years, with no conclusive evidence of a link

**Current situation**

**Animal Health Committee decision at March 2014 meeting:**

- *"to investigate the commissioning of a comprehensive risk based national cost benefit study of the management of BJD in Australia" because of "the difficulties in implementing an effective regulatory BJD control program given technical limitations with surveillance and diagnostics, the lack of international guidance such as from the OIE Code, risks from cross species contamination from small ruminants and difficulties in achieving a nationally consistent approach".*

**Benefits of deregulating BJD**

- No need for compensation
- Remove the financial commitment of MLA levy payers ($650Kpa)
- Remove the huge financial commitment of state Governments
- Remove the emotional stress and financial burden on owners of infected or suspect herds.

## Discussion:

In 2012, the Rockley Stud in Queensland requested their vet to investigate three cows having clinical signs of wasting, two of which were shown to be shedding BJD bison strain. To further investigate, Pooled Faecal Culture (PFC) tests were conducted on 218 cull 4-Y-0 plus cows with 27% of the group being over 10 years of age. Six animals (2.8%) were found positive from a sample specifically targeted at lighter/older animals, with one of the positives being over 13 years of age. The source of the infection is believed to be a Brahman bull imported from Texas in 1982that was part of a shipment from the USA to Queensland of 14 bulls. This bull died of a wasting syndrome in late 1988's. Bison strain is relatively common in Texan cattle herds

Trade restrictions were introduced on approximately 180 properties who had purchased Rockley bulls since 2005 mainly in Queensland, but included five very large stations in the Kimberly's and one in the NT. Approximately 710 trace forward Rockely cattle have been euthanized and post mortemed, with a further 70 live TFR bulls tests conducted. Of the 120 quarantined properties 789 trace forward post mortems were conducted with only 3 detected shedding JD (0.4%). On Rockley trace forward herds 11.800 in contact cow tests were conducted in Qld and 3 or 4 thousand in WA and NT.

**Industry Cost**

- Bull Testing Cost = 789*$1200 = **$946,800**
- Premature Bull Loss = 789*$2000 = **$1,578,000**
- Cow Testing =15,000 *$60 = **$900,000**

**Individual Property Cost**

- Rockley herd **$1.2 million** plus in lost income in first year of quarantine assistance capped at $100,000
- Destocking cost of 3 herds where a purchased bull tested positive cost **several million $**
- Ineligibility for live export has cost several stations in excess of a **million $ each**
  **(Qld compensation funds thus far paid $375,000 to 43 applicants)**

The only in contact cows that had tested positive is the 2013 Qld BJD Incident ( Hollins Bay Qld), who were tested because only 4 of their 7 purchased TF Rockley bulls were available for testing . Age distribution of cases means more likely infection preceded purchase of Rockley. Further evidence has suggested the Hollins bay JD was unrelated to Rockley. There is unconfirmed reports that recent lab test results indicate they are genetically quite different sub strains of the Bison Strain.

So no evidence of spread of BJD into another herd from any Rockley cattle despite having the infection on Rockley for over 30 years and have sold several thousand cattle since then to several hundred herds all the trace forwards showed was a very low rate of JD shedding (<0.4%) and in actual fact it has detected a completely separate case. The movement restrictions imposed on the quarantined properties have cost $15 million to Rockley clients who were prohibited from trading, suspect properties in Qld NT and WA are subject to domestic movement restrictions and are thus ineligible to export live cattle. Suspect herds in Vic are not subject to domestic movement restriction and are eligible to export live cattle and can trade to Indonesia. Indonesia requires nil clinical cases in previous 5 years. Suspect properties by definition have no clinical cases and even 50% of infected properties have no clinical cases of BJD in previous five years

The movement restrictions are based on the premise established by the JD Technical Advisory Group through the SDR&G (Standards Definitions Rules and Guidelines) that prevalence zones will create favourable export status associated with Crohn's Disease, yet these conditions have never come fruition.

For a strain of JD that has been present at Rockley for thirty years, approximately 180 of their client's herds have been investigated with testing of 15,000 plus in contact cattle demonstrating no

evidence of spread from Rockley has been detected with an incredibly low persistence, as shown by only three trace forwards with detected shedding. This has cost industry in the vicinity of $18 million dollars which is equal to $6 million per trace forward bull found to be shedding. An extraordinary cost for a disease that has been present for 30 years at Rockley with negligible impact to their productivity of their impressive herd.

Not only is this disease of little consequence in SE Australian beef herds (94% of infected beef herds report 1 or less clinical cases in previous 5 years ~50% none) the % of infected beef herds is low 2001 survey 36300 cows were blood tested from 394 herds with 7 cows confirmed positive (0.02%) from 5 herds 1.2%  3 of these positives were from 3 herds in far northern NSW.

**Strain Issue**

The issue of cross over between sheep strain in cattle and beef strain in sheep was ignored by the SDR &G.  S strain like C strain generally causes low prevalence disease in cattle but one documented case in 2005 in Victoria had 19% herd confirmed positive prevalence with three clinical cases in last two years in a herd of 73. S strains affected cows do shed M pub ( JD bacteria)  so some beef only herds will be infected as are several MN3 studs, yet beef only have free trade into PZ as does MN3 studs into WA .  In WA sheep JD is unregulated and spreading undoubtedly into some of their cows.  Sheep strain and Bison strain are both sub types of cattle strain of Mycobacterium axiom subspecies par tuberculosis  Qld had not been doing any strain typing so bison strain was not identified unit Qld NT and WA had progressed well down the road in their response to Rockley diagnosis assuming it was BJD.  Whereas Victoria has been strain typing since 2001 as a way of avoiding movement restrictions for S strain infected cattle and C strain infected sheep.

**The risk of a link being shown between JD in livestock and Crohn's Disease in humans**

No conclusive link between JD and Crohn's Disease has been demonstrated, even though it has been investigated for over one hundred years.

**What is the relevance to the Sheepmeat Industry?**

1. The recent experience of the sheep industry in attempting to coordinate a national response when states have different attitudes towards management/control as opposed to eradication/controlling the spread of the disease.
2. The strain cross over issue demonstrates  JD must be considered from a collective view point on how the disease should be managed and whether there is any link to Crohns Disease, and is there any real effect on exporting potential.

**Recommendation**

If there is to be a proposed National Review of BJD, the VFF Livestock Group would recommend a review (completely independent of all industry bodies) of all issues related to JD across all species. Such a review would need to address the following strategic issues:

- In beef herds in southern Australia 94% infected herds reported having one or less cases in previous five years. This is likely to be even more insignificant in far northern Australia.
- The real facts as related to the perceived trade issues.
- An economic comparison between continued regulation of BJD (and a true costing of compensation costs) v's the cost of deregulation with a view to management as opposed to eradication.
- Inconsistencies with management of other similar diseases not subject to any SDR & G such as pestivirus. Pestivirus also causes incurable fatal wasting disease, mortality rate

in infected herds is at least ten times higher than BJD. There are a similar number of pestivirus sensitive markets as there is JD sensitive markets and many more international jurisdictions attempting pestivirus eradication.

- There is no difference seen in Chrohns disease prevalence between Victoria and WA, yet for most of the 20th century Victorian dairy industry has been endemic BJD and WA has been free of sheep bison and cattle strain for most of the 20th century, yet crohn's and favoured export status are cited as the main reason for PZ SDR & G.