

Response to First Discussion Paper of the National BJD Strategy By Australian Brahman Breeders Assoc LTD

The report prepared Benoit Trudeau provides a good starting point to achieve change in the Management of BJD notionally and largely reflects the majority of opinions expressed in submission to the Review and the meeting in Sydney on February 16.

We are in agreement with much of the report however there are a number of issues where we are not in agreement or require clarification.

Treatment of S Strain

It has been firmly established that 'S' strain can cause clinical Johnes disease in cattle. The symptoms are identical and the rate of spread within a herd appears to be similar to C & B strains based on the published reports.

If an 'S' strain infection is established and sheading into the environment, based on extensive knowledge of the transmission of the disease, how could it possibly not transmit from cattle to cattle?

The review must treat all 3 strains as being capable of causing JD in cattle therefore Bovine Johnes Disease.

If producers are to take the responsibility for JD biosecurity risk they must be able to access tools to analyse risk and 'S' strain risk must be included.

The AHA web site claim the "cross infection between sheep and cattle in Australia is considered a rare event" is misleading in the light of recent strain typing results and should be removed.

The cattle and sheep industries management plans for JD should remain separate.

Disease Management and Trade Considerations

Access to export markets is determined by the BJD status of the property of origin of the cattle to be exported and has nothing to do with the Protected/Free/Management zones.

Properties which become infected will be excluded from export markets irrespective of the zone in which they reside.

The concept of producers managing their biosecurity risk and herd status has been established through the document and is also the basis for market access.

Regulatory Authorities General

If the regulator is to conduct "audits" based on risk profiling, what will be the status of these herds?

The evidence from Qld 2012 & Qld 2013 infections clearly shows trace forward herds are at low risk of spreading JD.

Risk assessments on trace forward herds should be voluntary and the responsibility of the producer not the regulator.

Regulatory Authorities – Trading Activity

There is no market access requirement for regulatory authorities to undertake “independent testing and satisfy BJD – related certification requirements”.

Export market access requires that “there is no known clinical evidence of Johnes Disease on the property for the last five years (some markets 3 years)”.

The property owner is required to certify to this effect and the Federal Department of Agriculture certifies against the producer documents as well as the herd status recorded on the national database.

The certification for BJD is similar to a number of other diseases and needs to be treated in the same manner.

Market assurance programmes which involve a level of audit testing are available to producers who wish to provide a higher level of assurance to their clients.

General Comments

While BJD is regarded as endemic in Australia, the prevalence does vary particularly in some jurisdictions.

The new National Management Plan will need to recognise this and accommodate the concept that some jurisdictions will prescribe different requirements to entry.

Submission of the Australian Government Department of Agriculture to the first discussion paper of the National BJD Strategic Plan Review

General comments:

- The discussion paper uses florid language and is hard to follow and, when taken as a whole, is ambiguous. Depending on the reader's view, it can be inferred to be supporting a wide range of approaches to future BJD management. Although this is perhaps understandable as the initial discussion paper, clearer direction will be needed in future iterations.
- For example, although deregulation and the treatment of BJD in line with other endemic diseases is expressed explicitly in the words of the text, the document seems to concurrently convey the need for all stakeholders to continue undertaking a large volume of work in relation to BJD management, inconsistent with our approach to other deregulated, endemic animal diseases where comparatively little is done, particularly at national level.
- The Department supports policy principles and guidance in the general area of established (or endemic) pest and disease management at national level, as developed through the National Biosecurity Committee's Intergovernmental Agreement on Biosecurity (IGAB) processes. It also supports the more specific AHC position statement on future JD management as provided via the AHC Chair.
- The document seems skewed to supporting known infected and traced herds affected by the current arrangements. Although this is to be expected it is important that future management takes into account the needs of industry as a whole, including producers who are free of the disease. Given their relative numbers, as much as is possible, they should not be unnecessarily burdened or placed at additional risk (compared to the current situation) by any new arrangement.
- It is important to capture that the issues with compliance and disincentives for reporting identified with the current program may continue to be difficult to resolve with a new producer driven approach. Compliance may continue to be an issue if businesses are affected.
- There is no specific need for a national zoning program to support export trade to JD sensitive markets. Export trade certification is generally based on the status of the property of origin, or in fewer cases, the health of the animals to be exported. No reference is made to the four zones in Australia. Additionally, no specific reference is made in export certification to tracing activities.
- Internationally, only Australia and Japan seem to have substantive regulated approaches to JD control, with other countries leaving disease management, where any exists, to industry/the private sector.
- While JD is currently listed by the OIE, this has been queried in the past and there is no content in the OIE Code to guide trade relating to the disease.
- However, JD is trade sensitive for live animals and genetics with a large number of trading partners. A current account of the export certification requirements for the range of importing countries and relevant commodities (breeding cattle, feeder cattle and genetics) has been provided previously by the Department. It should be recognised that such trading requirements are fluid and that the Department is often required to negotiate against proposals to increase BJD requirements.
- The discussion document seems critical of the current BJD program based on its purpose, and aspects such as trade "imperatives" and the differential treatment of producers across zones. The language seems to describe these aspects as fundamentally bad things, in and of themselves. The purpose and justification of the

current program, including differential treatment by zone, trading restrictions and the regulatory approach, was reasonable at the outset and remains theoretically so, that is, to minimise the spread of the disease nationally and to protect (or even restore/improve) the status of free and protected zones, including to make national and international trade safer. There is no way this program would have been introduced and persisted if its original intentions were not seen by a broad representation of experts and stakeholders as worth initiating and maintaining.

- However, given the passage of time the technical and compliance limitations associated with managing the disease in practice have become more obvious and have brought fully into question the relative benefits when compared to the apparent costs. Such technical (and resulting compliance) factors that hinder the effectiveness of the current program include, most substantially, the poor ability to properly characterise the disease across time and space. This is a result of the long incubation period, highly variable clinical presentation both within and between herds, limitations in accuracy of diagnostic tests, limited effectiveness and risks associated with vaccination, and risks from cross species transmission. Also influencing an assessment of the benefits vs the costs of the program over time are a clearer understanding of the relatively low levels of production loss and generally decreasing concerns around Crohn's risks.
- This type of approach focused on the technical limitations is accurate and removes blame and the need for some of the more emotive language that appears in the document. Rather, as governments, industries and even technical experts, there is collective responsibility for developing and supporting a program that was believed in, but due to a range of technical and compliance factors relating to the disease and beyond anyone's control, has now found us out and we urgently need to review. This is not so out of the ordinary in terms of the evolution of policies and programs covering complex technical issues. What is most important is that we recognise and respond to the need to retreat and reassess. The Department feels this may well involve a whole lot less activity focused on JD, rather than just a change to different types of activity. Our interest is in maintaining the integrity of our export certification process which, as mentioned, generally seeks assurance of clinical freedom in the premises of origin.

Comments on first section:

- Para 2: The language relating to Crohn's risk is unnecessarily emotive and dismissive and could usefully be toned down. It would be sufficient to convey that there continues to be a lack of conclusive evidence as to possible links, and that this situation, given the passage of time and further studies undertaken, should provide a commensurate lessening of scientific concern around this issue. As a Department we are conscious of the fact that a key trading partner with a highly developed science base (Japan) is not as dismissive of the link as this paper and takes a more precautionary approach.
- Para 5: The Department agrees that we should treat BJD analogous with other endemic diseases, unfortunately the discussion paper then goes onto to seemingly lay groundwork for a far more complex and differentiated system than applies to other endemic diseases.
- Para 8: The Department agrees that we should have a nationally consistent approach rather than a jurisdictionally based approach. Note that this is different to any comment on the scale or level of activity by government and/or industry around such a nationally consistent approach.
- Para 11: Jurisdictions might limit their role to confirming the status claimed by the producer, such as for the purposes of trade?
- Para 20: The justification for maintaining the separation between the 'strains' of JD is not well made, so far as the OIE and international trade environment are concerned

they are all paratuberculosis, so from this aspect there is little benefit in treating one strain in one species differently to a different strain in the same animal?

Comments on second section:

- Para 2: We are not so sure it is possible to simply and neatly separate ‘disease management and control’ from ‘trade related imperatives’. The ultimate goal of any such ‘trade related imperative’ is ‘disease management and control’ i.e. the prevention of spread (either internationally or nationally). The real question is how effective has the current program been in achieving disease management and control given technical and compliance limitations, and what is the true value proposition of such activity, including in relation to production and trade.
- Para 6: “its unquestioned remit” suggests that there is to be an ongoing BJD entity that may not necessarily be the case. We don’t have such an entity for other endemic diseases.
- Para 13: what does “trade-adjusted pathways” mean? Any producer can access any market for which they are eligible.
- Para 15: The document should be quite clear and explicit that quarantine or movement restrictions will not be imposed for BJD, consistent with other endemic diseases.
- Para 28: the meaning of this statement is unclear. If a producer has BJD on the property they cannot export to markets that have BJD requirements, so we are not sure how resources are to be provided by governments to support “trading pathways”. There seems to be lack of clarity on the role of governments, in terms of the Australian government that role is to negotiate certification requirements and certify against those requirements. The Department does not see a role for governments in managing the disease.
- Para 28: this refers to the authority to deal with BJD risk being devolved to the private level, but the responsibility to manage it, and maintain exports remaining at the public level. There is the risk of an authority/ responsibility mismatch occurring with this approach. It may be worth considering BJD as a herd quality issue and allowing industry to set up systems to assure that herd quality, perhaps as part of the Livestock Production Assurance system. Government could verify and certify as required based on this system.
- Para 31: “necessary test-based” – what tests are required? For export individual animal tests are not a common requirement for slaughter/feeder animals, clinical freedom at premises of origin is most commonly sought. We cannot see why a regulator would have any role in providing and disseminating information on BJD. We cannot see why a regulator would have any role in assisting and supporting producers in managing and controlling the disease or in supporting producers in their endeavours to trade? Our interest is in certifying the trade based on the importing country requirements.
- Para 31: The Department disagrees with the proposal that regulators would conduct audits. The Department disagrees with the proposal that regulators would provide testing infrastructure and resources and other undefined BJD related support.
- Para 31: Unclear why there is reference to “independently certified” animals or herds – why would this be a requirement for BJD when it is not a requirement for other endemic diseases?
- Para 34: “producers are required to satisfy authorities through independent testing” – this is not the case, at least for exports where testing for live export of slaughter/feeder cattle is the exception.
- Para 34: disagree with the proposal that it is the role of the authorities to assist affected producers in maintaining their operating capacity.



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4 May 2015

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To the BJD Review Team,

Re: National BJD Strategic Plan Review – AgForce Response to Discussion Paper

AgForce thanks the BJD Review Team for the opportunity to comment on the initial discussion paper and provides the following commentary in moving forward the management of JD in Australia.

About AgForce

AgForce is the peak representative body for broad acre primary producers in the cattle, grain, sheep and wool industries of Queensland and AgForce members collectively manage more than 50 per cent of Queensland's land mass.

As you may be aware the strategic vision of AgForce Cattle is for a 'progressive and profitable beef industry' for Queensland. A key part in achieving this is having appropriate systems in place that provides animal health, welfare and biosecurity assurances to our customers both domestically and internationally.

JD Management in Queensland: Strategy

Strategically, our objective for a National BJD management framework moving forward is that in the short, middle and long term the prevalence of BJD remains the same and it not spread further throughout the Queensland cattle herd.

JD Management in Queensland: Operational Application

Although the initial discussion paper does not go into great depth onto possible operational tools to achieve this, AgForce is firmly of the view that the following parameters should apply –

- A national approach is key that reduces risk of disease spread throughout the cattle herd
- Any future system should be backed by regulation and real risk management, including exploring assigning a risk status to each Property Identification Code (PIC)
- Acknowledge and mitigate risk from livestock traded from co-grazing properties
- Expert government support for technical and policy issues should continue to be provided as a core part of their biosecurity service provider and regulator role (i.e. an industry / government partnership approach)
- Trace forwards should be a risk managed approach as opposed to a blanket application in the instance of suspect properties
- This system should have appropriate rigour (for example, mandatory, meaningful and enforceable Cattle Health Statements (CHS) and ability to have vision of JD infected properties via the National Livestock Traceability System (NLIS))
- Remedial actions and incentive based compliance should be looked at to promote compliance with a risk management based scheme
- Incentives based compliance in relation to JD reporting should be explored at length by the Review, including a financial assistance schemes

AgForce has no particular comment in relation to –

- How the program is branded or badged provided robust and practical measures are in place that protects producers livestock and addresses trade risk (as outlined above)

Lastly, it is important to note that producers need to be continued to be provide with appropriate support. AgForce therefore encourages representatives from both the State and Federal Government on the BJD Review Team to make the Queensland Cattle Industry Biosecurity Fund a reality in order for industry to be able to provide meaningful support for our producers in the future.

Should you require further information please do not hesitate to contact Senior Livestock Policy Director Anna Campbell on 0429 649 881 or campbella@agforceqld.org.au.

Yours faithfully,



Anthony 'Bim' Struss
AGFORCE CATTLE PRESIDENT

1 May 2015

Submission to the Bovine Johne's disease Review

Background:

Animal Health Australia (AHA) is a not for profit company that fosters collaborative partnerships involving its members i.e. the Australian, state and territory governments, major terrestrial livestock industries, and other stakeholders (<http://www.animalhealthaustralia.com.au/>). Together we strengthen and improve the national animal health system to ensure competitive advantage and market access; and significantly, we achieve this through a more effective sharing of available and finite resources.

AHA facilitates a wide range of partnerships and manages collaborative programs that improve animal and human health, food safety and quality, market access, animal welfare, livestock productivity and national biosecurity, thereby ensuring confidence in the safety and quality of Australia's livestock products in domestic and overseas markets. These partnerships extend across three key AHA platforms that are intrinsically linked and together contribute to and support market access and agricultural competitiveness:

- Emergency animal disease preparedness and response – response framework, response plans, training, vaccine management, research
- Market access – surveillance, livestock welfare, diagnostics and laboratories, livestock production diseases
- Biosecurity services - biosecurity tools, plans and systems (including disease response and on-farm husbandry and productivity practices), livestock traceability.

Importantly, the key to managing these threats and risks is through governments and industries working together in partnership to: tackle livestock health issues; to fund research; to support emergency disease responses; and to collaborate on new and emerging issues such as animal welfare. AHA plays an active role to ensure these partnerships are effective by working with our partners and members to identify priorities and appropriate response actions, whilst maximising what can be achieved with available resources. This partnership model is almost unique in the developed world and therefore, should be considered a key contributor to our global competitiveness.

The BJD Review:

AHA is in a unique position when it comes to the Review. It has been asked by stakeholders to arrange the review with the goal of obtaining a national approach to how the cattle sectors will deal with BJD issues into the future.

As far as AHA is concerned, AHA:

- does not express its views in setting the future direction of BJD in Australia. This is set by those organisations that fund the project.
- is a service provider to its members
- ensures the review process runs as smoothly as possible
- administers systems determined by the stakeholders
- provides a technical support role for the stakeholders
- provides secretariat services for the review

It must be noted that AHA does not:

- set policy
- direct parties to undertake activities

The future policy for BJD will be set by the peak industry councils representing the cattle production sectors in conjunction with the Australian and state/territory governments. The peak industry councils have put in place a Reference Panel that will assist the councils make the necessary decisions required for the future. The Reference Panel is comprised of representatives of:

- Cattle Council of Australia – north, south, west reps
- Australian Dairy Farmers
- Meat and Livestock Australia
- Dairy Australia
- Australian Registered Cattle Breeders Association
- Australian Lot Feeders Association
- Australian Chief Veterinary Officer
- Chief Veterinary Officer s of states/territories
- Australian Cattle Veterinarians Association

ANIMAL HEALTH COMMITTEE ¹POSITION STATEMENT
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 Johnes'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.

(Submitted originally in February 2015)

Response to First Discussion Paper on a Recast of the National BJD Strategy by Australian Registered Cattle Breeders Association.

The report provided by Benoit Trudeau is a good attempt to identify the issues and a proposed way forward for a National BJD strategy but contains a number of flaws due to a lack of understanding of the complexity and politics of the disease. These flaws are outlined below.

Page 11 (15)

There is a fundamental misunderstanding of the definition of Bovine and Ovine Johnes disease. Bovine Johnes Disease (infection with Myobacterium Paratuberculosis) can be caused by “C” strain, “B” strain or “S” strain of MPtb. The clinical symptoms are identical. Despite what the AHA website says a bovine animal infected with “S” strain is not infected by Ovine Johnes Disease because it is a bovine (cattle) and not an ovine (sheep). It is infected with the “S” strain of MPtb and therefore has Bovine Johnes Disease. The strains of MPtb are not species specific. “C” strain can infect cattle, goats, camelids and deer. “S” strain infects sheep and cattle (and possibly other species)

It is completely misleading for the AHA website to claim that “cross infection between sheep and cattle in Australia is considered a rare event” A poster published by AHA in July, 2014 (Appendix 1) shows that of the newly infected beef herds in south eastern Australia, which were strain tested, between 2003 and 2013, 61% were infected with “S” strain only, 12% were infected by “S” and “C” strain and 27% were infected with “C” strain only.

The AHA website is misleading and out of date in order to justify the existing SDR & Gs which do not acknowledge the infection of cattle with the “S” strain of MPtb. It does not recognise the level of infections of “S” strain in beef cattle and should not be quoted in this or future BJD Review reports.

Page 12 (18)

See above. It does not make sense to “effectively admit the “S” strain of the disease into the “C” strain arena”. It simply has to be recognised that “S” strain can cause clinical disease in cattle and is therefore a cause of Bovine Johnes Disease.

Page 12 Summary statement

The current national BJD strategy refers only to Bovine (cattle) Johnes Disease. It does not apply to Ovine (sheep) Johnes Disease which is now deregulated under the National OJD Strategy. The new BJD strategy must recognise “S” strain as a significant cause of Bovine Johnes Disease. The term “cross infection” should not be used because it is quite likely (but as yet unproven) that cattle can transmit “S” strain to other cattle.

Page 14 Item 4

The quote here is a flawed statement as was much of the politically driven Finlay and Hill Report. Eligibility to export live cattle is based on the individual property status for BJD (and many other diseases). The Zone status is irrelevant. The certification of a property to export live cattle by the CVO is an individual property certification independent of the Zone status of that jurisdiction. The approval to export cattle by the Federal Dept of Agriculture is determined by the status of the Property Identification Code (PIC) of the property from which the cattle were born and/or have resided on as certified by the CVO of the jurisdiction.

Page 15 Summary statement

This statement is also not correct. The trade related imperatives do not vary between jurisdictions. The import protocols of the many importing countries do not distinguish between jurisdictions. The health protocols signed off by Federal Dept of Ag apply equally to a herd in the deregulated Management Area (Vic & Tas) as to a herd in the Protected Zone (Qld & NT) or the Free Zone (WA). With regard to beef there is no such thing as Qld beef or Victorian beef. There is so much movement of cattle between jurisdictions prior to slaughter that definition of exported beef by the state where it was slaughtered is a not logical. For example the Teys company processing facility at Wagga Wagga slaughters cattle originating from Tas, Vic, SA and possibly Qld. Teys also has processing facilities at Biloela (Qld) Beenleigh (Qld) and Naracoorte (SA) which slaughter cattle from multi state origins. JBS have processing facilities in Rockhampton (Qld), Dinmore (Qld) Yanco (NSW) and Melbourne (Vic). State boundaries bear no relevance to the source of cattle slaughtered at an individual processing facility or in general the brand under which the beef is marketed.

A box of manufacturing beef exported to any country including the USA and Japan by a single company could be derived from beef or dairy cows from any state in Australia. The cattle could come from herds of any BJD status.

It is very easy to distinguish between disease management/control and trade implications as they are quite separate issues. The problem is that AHA, some State Farmer Organisations and some State Governments have deliberately and mischievously overlapped the two in order to justify their regulatory approach to BJD.

Page 17 summary statement

Correctly states that BJD should be managed on farm

Page 20 summary statement

Correctly states that the Zone system should be abandoned

Page 22

Regulatory Authorities – Trading Activity

Independent certification by regulatory authorities has not and is not required. The regulatory authorities should not be required “to conduct such confirmation testing as may be deemed necessary or appropriate to complement the independent testing”.

For live export requirements the Federal Dept of Ag simply requires a certification from the jurisdiction DVO that “there is no known clinical incidence of Johnes Disease on that property for the last five years”. Testing by the farm owner or the Government is not required.

Those property owners who wish to provide a low risk disease statement to potential purchasers of their cattle can do this by independently audited testing and biosecurity programs as are provided in the Market Assurance Program (MAP). A higher risk option is a single check test on older cows by an accredited veterinarian as is now required of the owners of Qld herds who wish to sell cattle to WA.

Page 23 summary statement.

There should be no requirement for “authorities to verify testing and certification”. The maximum requirement of importing countries is that there is no known infection with BJD for a defined period (usually five years) There is no requirement for authorities to conduct independent testing. It is not done in the sheep industry in Australia which has deregulated OJD and nor does it need to be done in a deregulated BJD environment. The cattle industry does not have to reinvent the wheel. It simply needs to replicate the way the sheep industry manages OJD.

Quoting of sources

It is misleading to quote from the AHA website and the Findlay and Hill report because they both unashamedly support the status quo which is exactly what this report so clearly demonstrates needs to be changed. These sources should not be quoted in this or future BJD Review reports

General comments

This review of the current National BJD Strategy can be made complex, over consultative and use a very large sledge hammer to crack a very simple nut or Made simple and straight forward. The straight forward approach would be as follows;

1. The BJD Review Panel makes recommendations along the lines of
 - Bovine Johnes Disease (BJD) can be caused by the “C”, “B” and “S” strains of Myobacterium Paratuberculosis.
 - the Zoning system is abolished
 - there is no obligation for jurisdictions to quarantine known infected or trace forward (suspect) properties (by removing Zones).
 - that the responsibility for managing or eradicating BJD is the responsibility of the owner of the herd.
 - that the existing risk management systems including the MAP program, check testing and statutory declarations of non contact with dairy cattle (and infected sheep flocks) be maintained and declared on Cattle Health Statements.
 - that BJD will be a notifiable disease whenever it is considered a notifiable disease by the OIE
 - a small working group is established as soon as possible to draft a national BJD strategy and modify the SDR & Gs accordingly using the OJD strategy as a guide
2. That an education program is implemented which explains to cattle owners (beef and dairy);
 - the etiology of BJD including possible infection with “C”, B” and “S” strains of MPTb
 - on farm biosecurity systems which will minimise the risk of introducing BJD to a herd believed to be free of BJD.
 - recommended management practices of BJD in a known infected herd to minimise clinical cases
 - recommended methods of attempting to eradicate BJD should the owner of a known infected herd wish to attempt to eradicate the disease from his/her property/herd

These statements and recommendations are made with recognition that the regulation or non-regulation of BJD is ultimately the responsibility of the jurisdiction under their respective legislation.

The history of the National BJD Strategy and its associated Standard Definitions, Rules and Guidelines is that ultimately jurisdictions make their own rules and variable interpretations of the SDR & Gs.

This BJD Review simply has to get the overarching national approach right and then let the jurisdictions make their own decisions about how to manage BJD. The current variability of regulation/deregulation implemented by jurisdictions indicates that this already happens.

Complete national agreement “on one size fits all” management of BJD is not required or achievable as is demonstrated by the current management of OJD in Australia.

Prepared by Alex McDonald in consultation with the ARCBA Executive
26 April 2015

I acknowledge receipt of the review and have carefully read it. I am happy it is heading in the right direction and strongly endorse the principle that control measures should be science based.

I do see some problems with the proposition of setting aside the perceived connection between BJD and Crohns Disease.

The root of the problem as I see it is the development of the concept that responsibility for food safety should be passed back to the farm has resulted in some issue being addressed at the wrong end of the food chain.

Perceived problems about food safety should be addressed first in the kitchen and then by measures back up the supply chain. It is ridiculous to think the danger of exposure to M. paratuberculosis can be prevented at the farm level.

I am also concerned that the end result of producer responsibility will not result in a different predicament in the north in the event of a suspicion of BJD. When the research priorities are discussed the epidemiology of BJD in the low prevalence areas must be high on the list.

Regards

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MEMO

FROM: Angus Atkinson **TO:** Justin Toohey
DATE: 4/5/2015 **RE:** National BJD strategy discussion paper

General comment:

This appears to be an excellent start to the review of the BJD program, at this stage I would support them. I will raise this matter within the NSW Farmers Association Cattle Committee and get some feedback ASAP.

Major issues:

Proposes significant change to current plan, in simple terms, deregulation.

A major concern of deregulated is who and how would irresponsible owners be held accountable if cattle from their property infected next door. If one of my neighbors trades cattle in a deregulated market, suspect BJD cattle would be available at discount prices and therefore an attractive purchase. If the infected cattle get on my property despite my biosecurity plan, what actions could I take?

A number of important issues need to be discussed including the concept of the new plan separating OJD and BJD or consider them as one issue. Current proposal maintains separation. It would be advantageous if a summary of all research on BJD/OJD programs relating to the effectiveness and cost of the research was available.

Minor points:

Some of the language used in the document could be simpler and easier to understand. I appreciate the format of the document, it has page and section numbers making reviewing the document easier. However each recommendation was not identified, it would be better if they were.

No list of acronyms

pg	section	comment
8	3	“We like” change of language, who is “we”
10	8	“The spirit” ...language used could be plainer/not easy to understand



3 May 2015

BJD Review Team
Animal Health Australia
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By email: bjdreview@animalhealthaustralia.com.au

Dear BJD Review Team

RE: REVIEW OF NATIONAL BJD STRATEGY – FIRST DISCUSSION PAPER

Cattle Council of Australia is the peak national body for the Australian grass-fed cattle sector, with its membership comprising direct subscribers and all State Farmer Organisations; the Australian Registered Cattle Breeders' Association and the Australian Cattle Veterinarians' Association are Associate Members.

Representatives of Cattle Council are directly involved in this review of the BJD Strategy, including as members of the Review Panel. The Council itself will have a significant role in assessing the final model resulting from the Review and whether all or part of it will be acceptable for the grass-fed cattle sector.

It is expected the Panel will receive submissions from most of Cattle Council's Members and Associate Members and that these submissions will contain significant areas of agreement and disagreement. The Council will be meeting in late May to discuss these elements in some detail; at this stage, contained in this submission is only brief comment about each of the 'Proposals' written (as bolded paragraphs) in the First Discussion Paper.

Cattle Council looks forward to maintaining a high level of interest and interaction in the iterative process planned for the remainder of the review and the debate that will undoubtedly follow.

Yours sincerely



for Mr Jed Matz
Chief Executive Officer

Att: CCA comments on Proposals



**SUMMARY OF CATTLE COUNCIL’S RESPONSE TO EACH OF THE PROPOSALS
CONTAINED IN: *First Discussion Paper on a Recast National BJD Strategy***

Opening Comments

1. With the exception of a couple of ‘wordy’ Proposals, the consultant, Benoit Trudeau, has presented a well-argued paper that appears to capture the main points made at the all-party Workshop on 16 February and the Panel discussion on 17 February 2015.
2. It is noted there is a plan for the Panel to meet up to four times regionally during the review. Following each meeting an updated and expanded Discussion Paper is anticipated from the consultant, allowing repeated opportunities for industry and others to provide input. The first regional meeting is scheduled for Queensland on 15 May 2015.
3. There have been, and will continue to be, meetings at jurisdictional level to facilitate the development of policy positions at that level. Some Cattle Council representatives attended the meeting held in Brisbane on 16 April 2015.
4. A small matter, but it would help if in future Discussion Papers the recommendations or proposals could be numbered sequentially for ease of reference.

Specific Comments

PROPOSAL FROM DISCUSSION PAPER	CCA COMMENT
<p><i>The updated national BJD strategy set aside any reference to a putative link between BJD and Crohn’s disease until compelling evidence of such a link is brought forward. [p. 8]</i></p>	<ul style="list-style-type: none"> • Supportable. • Although the ongoing attempts by some international scientists to prove a causative link remains a concern, their failure to do so over decades of work should be taken into account. • Australia must nevertheless maintain a watch for international developments that may trigger a more proactive mechanism being required.
<p><i>The updated national BJD strategy should treat BJD in a manner analogous to that with which we apply to the management and control of other endemic animal diseases. [Noting the footnote with possible variation: <i>Alternatively, if variation in approach there is to be, that the rationale for such a variation be sounder in logic, more transparent in its rationale and national in its application than is the case at present.</i>] [p. 9]</i></p>	<ul style="list-style-type: none"> • The principle seemingly behind this is sound: the removal of disincentives for producers to be involved in the program by running it as a ‘management’ rather than ‘control’ program. • Each endemic disease, and our approach to it, is different, making “analogous” treatment a concept that needs much more discussion. • Importantly, this proposal is about removing the disproportionate negativity that surrounds BJD, particularly in the north and west of Australia.
<p><i>The updated national BJD strategy should significantly reduce (and ideally remove altogether) inconsistencies of approach between jurisdictions – inconsistencies that produce material disparities in the treatment of producers whose herds are touched by BJD, irrespective of geographic location. [p. 10]</i></p>	<ul style="list-style-type: none"> • Supportable. • In a practical sense this may be idealistic, but worth aiming for. As a country of federated states that have responsibility for their within-border disease-management policies, it has traditionally proved nearly impossible to attain a nationally consistent approach to anything related to disease/welfare management and/or control, JD being no exception. • Having said this, consistent national acceptance of the <i>concept of low prevalence areas</i> can be achieved, provided those upholding such areas can validate their claims.



PROPOSAL FROM DISCUSSION PAPER	CCA COMMENT
	<ul style="list-style-type: none"> Consistency also in the way jurisdictions handle 'notifiability' of JD is a critical element to the success of any future JD management program.
<p><i>The updated national BJD strategy should, in its next iteration, (a) maintain the separation between bovine and ovine Johne's disease – and thus the separation of the associated management and control strategies; (b) acknowledge the risk of such cross-infections occurring; and (c) encourage the active management of the risks involved through biosecurity education and practice improvement initiatives. [p. 12]</i></p>	<ul style="list-style-type: none"> Acceptance or rejection of part (a) of this proposal is entirely dependent on whether cattle can be infected with S strain and sheep can be infected with C strain. Strong empirical evidence supports this to be the case, certainly in southern Australia at least. This being so, it is incumbent on those supporting the maintenance of the separation to argue for it, rather than the opposite¹; that is, the default should be the removal of the separation and the merging of management programs for the sheep and cattle sectors. (Nomenclature would become "JD", "MAP" and/or "paraTB"). There is no mention here of the dairy sector. How will it feature if the cattle and sheep programs were to be merged? Parts (b) and (c) of this proposal are strongly supportable.
<p><i>The updated national BJD strategy should articulate a clear and crisp definition of its intent and focus by: (a) distinguishing disease management and control matters, which are its unquestioned remit, from trade-related imperatives, which will vary from one jurisdiction to another as well as by type of trade; and (b) giving trade considerations their due and proper place by explaining the link (and separation) between the two. [p. 15]</i></p>	<ul style="list-style-type: none"> Supportable. Presumably, national acceptance of this proposal will lead to: <ul style="list-style-type: none"> ~ clarification of trade-related issues; ~ clarification of production-related issues; and ~ a balanced plan designed to suit both. Again, national consistency is essential in the way jurisdictions deal with 'notifiability' given the impacts on trade of live animals from different areas of Australia.
<p><i>The updated national BJD strategy should: (a) rest on a basic tenet and default position of self-determination for producers whose herds are BJD-affected; (b) guide and assist producer self-determination through science-based, jurisdiction- consistent and trade-adjusted pathways that, if followed, allow producers to manage and control BJD in their herd; limit the spread of the disease (typically as part of biosecurity practices); and, most importantly, allow the producer to manage his or her future with neither penalty nor stigma. [p. 17]</i></p>	<ul style="list-style-type: none"> Supportable. This proposal lies at the heart of the future program. Acceptance of this proposal will lead to the development of a plan that will allow producers to continue trading, albeit under full-disclosure principles², even if JD is found in the herd. One detail under this proposal will be whether herds found to be 'infected' are managed in a way that's different from those found to have the organism but without infection. Very important to the successful application of this proposal will be the provision of adequate tools for

¹ Western Australian industry representative bodies have indicated their intention to press for the maintenance of the separation between C and S strains on the basis that, among other things, scientific proof of 'homogeneity' remains absent.

² Although the mechanism for full disclosure is yet to be determined, it will most likely comprise at least the widespread use of the Animal Health Statement.



PROPOSAL FROM DISCUSSION PAPER	CCA COMMENT
	<p>use by the producer as a means of ‘managing’ the disease:</p> <ul style="list-style-type: none"> ~ better tests ~ better understanding of the organism’s behaviour; ~ adequate declaration mechanisms for full disclosure, etc.
<p><i>The updated national BJD strategy should: (a) recognise the producers (rather than regulators) as owners and managers of the BJD risk in their herd(s) irrespective of jurisdiction – and thus obviate the need for the zone system in a scheme designed for disease management and control (rather than trade); (b) have government resources (including CVOs) and industry assist producers in managing the risk of BJD manifesting in a herd through biosecurity-driven education; (c) have government resources (including CVOs) and industry assist producers in managing the disease, should it manifest nonetheless; and (d) have government resources (including CVOs) and industry support producers’ viability through the use of trading pathways that recognise export trading requirements where appropriate. [p 20]</i></p>	<ul style="list-style-type: none"> • This proposal seems similar to the previous proposal, except with the obvious addition of reference to government resources and obviating the need for zones. • Industry obviously supports government collaboration where necessary, without encroaching on the basic tenet of the plan as described in the previous proposal: “self-determination for producers...” • obviating the need for the zone system is a likely outcome; however, this is in reference to the zone system as it is now: there must still be an opportunity for ‘areas of low prevalence’ should producers within those areas desire it and be able to validate their claims of low prevalence. • In spite of (a) and in support of (b), (c) and (d), effective and nationally consistent co-regulation will be essential. Governments will be relied upon to support industry through the provision of underpinning legislation for Animal Health Statements and potentially appropriate trading pathways for each level of infection within a herd.
<p><i>Consistent with the producer, property and herd-focussed principles enunciated earlier, the updated national BJD strategy should rely on a producer-centric responsibility structure (a) in which, in ordinary circumstances, producers are required to satisfy authorities, through independent testing, as to the fitness of their herd (or property) for the trade in which they propose to engage – particularly where export trade is concerned; and (b) in which the role of the authorities is to verify that testing and certification, and conduct supplementary, risk-based audits as they see fit; generally, provide assistance and support to producers in understanding and fulfilling the conditions that apply to the type of trade in which they wish to engage; and, where BJD manifests, to assist affected producers in maintaining such operating capacity as is open to them under the regulations governing the trading that can take place in their circumstances. [p. 23]</i></p>	<ul style="list-style-type: none"> • Supportable.

2/04/2015

Response to the National BJD Strategy first discussion paper.

From	Robert & Jacqueline Curley, Gipsy Plains Cattle Co Large Scale Stud and Commercial cattle producer
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Benoit Trudeau has represented the issues reasonably well that were presented at the Sydney Forum which we attended.

Therefore we would assume he has represented the views of the Reference body equally.

We make the following comments as our summary to the review process – but not referenced to the individual paragraphs.

There has not been any mention of the compensation requested for producers who have been seriously financially and socially affected by the current AHA strategy in place and have carried the major damage bill for the collective beef industry.

There seems to be mis-information about the cross infection of the three strains of BJD, the C – B – S strains.

Science is to be used for the benefit of the review – not possibly as a “tactic” to push an agenda that is not in the best interests of the major stakeholders who are the actual beef producers.

The C strain is the disease in question, and it should be noted that B & S strain can also cause BJD in cattle, but not pushed as an amended policy agenda by AHA and associated parties. Regardless whether they be B S or C strain – it appears that they all cause the same identical disease in cattle.

All sectors of the beef industry and government bodies must make decisions which are only necessary for the actual certification needs for BJD export protocol to “the country of import” for each individual consignment. From this review process, these protocols appear to be interpreted by Australian departments as they see fit to align with current Australian AHA policy. Eg our Zone status is irrelevant to our international customers.

Using the Findlay Hill report summary released by DAFF as a true and accurate economic analysis is misleading for those who have not read the original report in full. Our own interpretation of that report was that BJD is an economically insignificant disease with the potential for disaster in the beef industry only caused by regulatory bodies. The summary eventually released by that report – which incidentally was pushed by affected parties requiring proof of the reports existence – was quite evidently written to support the current AHA and associated parties line of thought. We would like to reinforce that of the hundreds of beef producers we have spoken to about the BJD regulations, the only person who publicly agreed with the current regulations is a CCA AGforce representative. Other producers spoken to prefer to manage this disease with the same principles as all other endemic bovine diseases.

This review summary by Benoit Trudeau indicates that the general feeling is that BJD should be producer owned and driven followed by Biosecurity support and risk management undertaken by bio-security as the preferred approach,

including the ability of “audits” by AHA as it sees fit based on risk profiling and still using trace back and forward – regulating where animals can be marketed.

I would suggest that this approach is identical to the current situation in most aspects only with the changes of ALL COSTS NOW POSSIBLY BEING INCURRED ON BEEF PRODUCERS – with the only physical change being the actual certified property quarantine being lifted. The actual situation of the beef producer would not be improved greatly. The beef property business is still being “managed” by AHA.

This is not the outcome that information presented to the floor was pointing towards.

The final summary of the reference body and we do quote (34) appears to have moved back towards AHA and associated bodies line of thought.

We would push this review process body to recognize they are making recommendations on the best interests of the major stakeholders of the beef industry who are the people who actually produce the beef. These are the people who need the current unnecessary, unworkable BJD process changed to sensible producer managed disease regulation in line with other associated disease policy to survive. The regulating bodies personnel are trained in many areas which enable them to transfer to other industry and departments in the event of less need for regulation. Not so with livestock producers who are generally only trained in one field.

Our final comments on the current stage of this review.

It was clearly evident what was required by beef producers at the initial forum. Producer management without regulation as per other endemic bovine disease. The reference body appears to be struggling with this concept.

Any extension of this review that may change that producer management outcome may be a misuse of taxpayers and producers funds. The beef industry, and particularly the stud industry has a blanket of uncertainty where a stud beef business will be bankrupted by the current regulation in the event of BJD surfacing – as was actually written in the Findlay Hill report. As a stud producer who was quarantined and then freed from quarantine, we can verify there is huge damage via stigma to be even associated with the disease. We were only associated by a trace forward for three months with caused us massive financial losses. This is a direct result of fear that prospective clients business will be damaged by the current regulation if they are also associated by default. The total number of stud beef producers in Australia has not been listed but we would suggest they are quite high in number. They in turn quarantine all of their commercial suppliers who buy seedstock . A complete domino effect.

Ignorance of the science associated with BJD by producers and regulators alike makes the scenario 100% worse. An education program to explain and outline the actual risks of BJD and the most effective way to manage the disease should be implemented.

If a producer friendly framework for BJD policy as per other endemic bovine disease can be implemented as a National strategy, this will be a huge step forward for the Australian beef industry.

Robert & Jacqueline Curley

Directors of Gipsy Plains Cattle Co



SUBMISSION TO THE REVIEW OF THE NATIONAL BOVINE JOHNE'S DISEASE STRATEGY

DEPARTMENT OF AGRICULTURE AND FOOD WESTERN AUSTRALIA

FIRST DISCUSSION PAPER - 1 MAY 2015

1. The updated national BJD strategy set aside any reference to a putative link between BJD and Crohn's disease until compelling evidence of such a link is brought forward.
 - a. WA Response: **Agreed** – *the aligning of this suggested “public health risk” with the management and control of BJD has been used to portray reason for control with no adequate evidence or scientific rigor.*
2. The updated national BJD strategy should treat BJD in a manner analogous to that with which we apply to the management and control of other endemic animal diseases.
 - a. WA Response: **Agreed in principle** – *the definition of endemic animal diseases needs to be better defined. From the discussion paper it would appear that endemic animal disease is more defined as a common disease of animals in Australia rather than a disease that commonly occurs in a geographical region. BJD to date has not been found to be “endemic” to WA or to WA animals and consequently deserves to be treated in a similar manner as other diseases or pests that do not exist in WA. As such, further discussion with open and adequate surveillance is needed to be undertaken to better address the correct national picture in regards the prevalence of BJD in Australia.*
3. The updated national BJD strategy should significantly reduce (and ideally remove altogether) inconsistencies of approach between jurisdictions – inconsistencies that produce material disparities in the treatment of producers whose herds are touched by BJD, irrespective of geographic location.
 - a. WA Response: **Agreed in principle** – *as it is a National strategy harmonisation of approaches between the jurisdictions is ideal, the only way that inconsistencies can be reduced between jurisdictions is for “zoning” to be removed from the national strategy and an adoption of an industry/producer lead self-determination pathway for the control of BJD (deregulation of BJD). This however still does not address potential wishes of industry to maintain low prevalence areas of disease which is based on geographical location. All current WA movement conditions relating to BJD (with one exception – from QLD) are consistent with the national BJD program.*
4. The updated national BJD strategy should, in its next iteration, (a) maintain the separation between bovine and ovine Johne's disease – and thus the separation of the associated management and control strategies; (b) acknowledge the risk of such cross-infections occurring; and (c) encourage the active management of the risks involved through biosecurity education and practice improvement initiatives.
 - a. WA Response: **Agreed in principle** – *provided that further research is conducted into the risk posed through cross infection of the different strains. There is evidence to suggest that cattle can be infected with S strain, but more work is needed to determine the potential for cattle infected with S strain to shed sufficient quantities of organism to infect other cattle and sheep.*

5. The updated national BJD strategy should articulate a clear and crisp definition of its intent and focus by: (a) distinguishing disease management and control matters, which are its unquestioned remit, from trade-related imperatives, which will vary from one jurisdiction to another as well as by type of trade; and (b) giving trade considerations their due and proper place by explaining the link (and separation) between the two.
 - a. WA Response: **Agreed** – *Where ever there are diseases of trade significance the clear distinction between disease management and control, and trade is hard to achieve. It is important that a national strategy should not be used as a barrier to trade by jurisdictions without rigorous scientific risk assessment and mature discussion to facilitate the final decision. By their very nature most disease control programs rely on zoning and movement controls based on epidemiological principles which may have trade implications. The true role of BJD in market access needs to be elucidated.*

6. The updated national BJD strategy should: (a) rest on a basic tenet and default position of self-determination for producers whose herds are BJD-affected; (b) guide and assist producer self-determination through science-based, jurisdiction consistent and trade-adjusted pathways that, if followed, allow producers to manage and control BJD in their herd; limit the spread of the disease (typically as part of biosecurity practices); and, most importantly, allow the producer to manage his or her future with neither penalty nor stigma.
 - a. WA Response: *This proposition needs further work and discussion. Effectively it is stating that the management and control of BJD should be deregulated, and a producer of a BJD affected herd should be able to take responsibility for the control and management of BJD without regulatory impacts, penalties or stigma. The realities dictate that there will be penalties regardless of disease regulation when taking into account trading cattle to different markets. How producers manage this as a deregulated disease would rely on an effective industry program assisted by government jurisdictions along clearly defined roles and responsibilities. Industry and Government need to agree firstly on whether BJD should be nationally deregulated. After this has been decided, this proposition can then be discussed. Producers in the south of WA as indicated by their representative industry bodies, have indicated they would like our free zone to be maintained if possible. This would not be achievable with deregulation.*

7. The updated national BJD strategy should: (a) recognise the producers (rather than regulators) as owners and managers of the BJD risk in their herd(s) irrespective of jurisdiction – and thus obviate the need for the zone system in a scheme designed for disease management and control (rather than trade); (b) have government resources (including CVOs) and industry assist producers in managing the risk of BJD manifesting in a herd through biosecurity-driven education; (c) have government resources (including CVOs) and industry assist producers in managing the disease, should it manifest nonetheless; and (d) have government resources (including CVOs) and industry support producers' viability through the use of trading pathways that recognise export trading requirements where appropriate.
 - a. WA Response: **Agreed in principle** – *this again is stating that the control and management of BJD should be deregulated and give producers and industry ownership of BJD control and management. If this is the case, industry should bear the greater burden of resourcing with government providing assistance in line with industry agreements. It is effectively stating that zoning and the low prevalence areas should be abolished which does not seem to be supported by significant sectors of industry in those areas including some in WA.*

8. Consistent with the producer, property and herd- focussed principles enunciated earlier, the updated national BJD strategy should rely on a producer-centric responsibility structure (a) in which, in ordinary circumstances, producers are required to satisfy authorities, through independent testing, as to the fitness of their herd (or property) for the trade in which they

propose to engage – particularly where export trade is concerned; and (b) in which the role of the authorities is to verify that testing and certification, and conduct supplementary, risk-based audits as they see fit; generally, provide assistance and support to producers in understanding and fulfilling the conditions that apply to the type of trade in which they wish to engage; and, where BJD manifests, to assist affected producers in maintaining such operating capacity as is open to them under the regulations governing the trading that can take place in their circumstances.

- a. WA Response: **Agreed in principle** – *this again is stating that the control and management of BJD should be deregulated and give producers and industry ownership of BJD control and management. Industry needs to accept that if this is to occur then it needs to take a greater responsibility and ownership in developing the agreed pathway with the jurisdictions and also provide the resourcing of any decided option.*

The paper seems to be very supportive of deregulation without considering all the aspects. It portrays the current situation as gross over-regulation without considering the benefits to those producers in the current low prevalence areas.

This paper does not address issues involving the real costs to industry of managing BJD in areas where it is currently endemic and unregulated. It also does not deal with what effect a nationally deregulated BJD environment would have on export markets.

Prepared by Tom De Ridder and Bob Vassallo

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4 May 2015

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

Dear Duncan

First Discussion Paper on a recast National BJD Strategy

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

The ADF is the national peak policy body for the Australian dairy farmers on issues of national and international importance. Dairy Australia is the dairy industry-owned service company, limited by guarantee, whose members are farmers and industry bodies, including the ADF and the ADPF.

The dairy industry supports the need for change to the present strategy. It is recognized that the First Discussion Paper which draws on views and information provided as part of the wider consultation process explores assumptions and approaches for a revised BJD Management Strategy. As an initial start to the process the Discussion Paper does not cover all matters that will be necessary before resolution of the Propositions that have been presented in this Discussion Paper.

In particular, the First discussion Paper tends to focus on the management of BJD on affected properties and the need to fulfil trade imperatives as a major driver for the BJD Management Strategy is underplayed. The dairy industry agrees that evidence has not been presented to confirm a causal link between Crohn's disease and *Mycobacterium paratuberculosis* infection yet there continues to be international pressure and the perception of public health consequences can also dramatically affect trade. This perception of a link is an important matter that must not be set aside in the development of a recast National BJD Strategy because the management of BJD underpins a precautionary food safety approach that supports the reputation and integrity of Australian produce.

The Discussion Paper provides the expressed views clearly and proposes that the general features of the recast strategy – should be open, consistent, science-driven, risk-based, producer-empowering, and voluntary participation in disease containment, meets trade imperatives and has light regulatory impact. The summary statement refers to being demonstratively consistent with itself and with the treatment of similar diseases.

The dairy industry notes that consistency with the management of similar diseases may be desirable but diseases with different features (control options) and different trade risks may require different management strategies.

Specific objectives of the recast BJD Strategy:

The Discussion Paper proposes setting aside consideration of links between BJD and Crohn's disease.

The dairy industry believes this may be difficult and is not appropriate because the potential link is a major factor contributing to the trade imperatives to manage BJD.

The Discussion paper proposes removing differences (interpretation/discrepancies) between jurisdictions with simpler uniform approaches and measures.

The dairy industry agrees this is valid and desirable but it fails to recognise that there may be different objectives or risks requiring different strategies to meet united national objectives. The proposed specific objectives fail to recognise a need to provide support to producers and markets that desire to prevent or minimise the introduction of BJD or M. paratuberculosis infection with purchased livestock.

Four fundamental propositions (*Dairy industry comments and views are shown in italics*)

1. Set aside reference consideration of links between BJD and Crohn's disease.

This will not protect markets when others make claims promoting the similarities between the diseases and result in adverse trade impacts. This is an important imperative for the strategy.

2. Consistency of Approach. BJD to be treated the same as other endemic diseases.

Incorporating BJD management and control in an overall biosecurity framework is sound but if the features of the diseases and the objectives for management are different then different approaches may be relevant.

3. Consistency of application between jurisdictions.

This is desirable for a national strategy but it may remove an opportunity to act for the collective common good of sub-groups desiring to protect a low risk status and support market access.

4. Strains of *M. paratuberculosis* to be managed separately whilst acknowledging risk of cross-infection.

*This proposition will require consideration of the risks to trade from infection with *M. paratuberculosis* compared to risks of BJD (disease) and possibly the specifics of managing cattle infections on OJD affected properties.*

Four propositions in regard to operational matters

1. Distinguishing disease management and control priorities from trade priorities.

There seems to be some confusion as what are the trade imperatives (to meet the requirements of purchasers and markets) that stock and livestock products (to be fit-for-purpose) are usually directed towards minimising spread or introduction of infection. These trade imperatives have been the major driver for BJD management and control objectives and need further consideration in the recast strategy development.

2. Rebalancing regulator/producer responsibility, includes the role of quarantine and disease tracing and supports self-determination allowing a range of trading options.

This proposition is mainly concerned with a focus on affected producers and there appears to be little support for producers seeking to prevent or minimise the risk of introduction of infection.

3. Territorial constructs, envisages removal of the zone system with responsibility for management of BJD risk transferred to producers irrespective of jurisdiction, with industry and government assistance through education, disease management and trade support.

The current zone arrangements provide protections and assurances greater than the proposed education assistance, particularly for wider stakeholder interests from unintentional or deliberate failure to observe recommended practice.

4. Export trade requirements, the proposition appears to focus on testing to meet obligations

The constraints of testing have been acknowledged and it would be appropriate to also include other assurances such as absence of clinical disease.

The dairy industry looks forward to participating in the ongoing consideration and development of a recast BJD management strategy.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and curves, representing the name David Losberg.

David Losberg
Senior Policy Director
Australian Dairy Farmers Limited

A handwritten signature in black ink, written in a cursive style, representing the name Robin Condron.

Robin Condron
Manager Animal Health and Welfare
Dairy Australia

As beef cattle producers, primarily for the live export trade, we appreciate the opportunity to comment on this First Discussion Paper on a recast National BJD Strategy.

We welcome and support the 'light-touch' regulatory approach proposed in this discussion paper and believe a recast of the National BJD Strategy is long overdue. While we agree it is critical to separate the disease control considerations from the trade-related imperatives, it is also essential to ensure that unworkable and unnecessarily restrictive obligations are not placed onto producers.

As a first step, it is essential to identify which markets would require herds to be tested and BJD-free and which would be satisfied with the conditions that no clinical signs of BJD are present. If all export markets require independent testing, serious consideration must be given to the logistics involved.

As it takes three years of testing for herds to be verified as BJD-free, this requirement would cripple the northern beef industry and have severe and long-lasting impacts on our trading relationships. As was evident in 2011, any disruption to trade damages Australia's reputation as a reliable, consistent source of produce and strains international trading relations.

In addition, serious consideration needs to be given to Australia's capacity to process the sheer volume of samples that would result from such a policy decision. If laboratories cannot process samples in a timely manner, this will add unsustainably high levels of time and cost. The beef industry simply cannot bear the cost of additional testing.

If there are no trade barriers associated with BJD it should not be regulated at all. Economic analysis done by MLA rates BJD as an extremely low priority in terms of economic impact. The bureaucracy and red tape associated with BJD regulation has added enormous strain to northern beef businesses and the money and resources would be far better allocated to addressing issues that will actually assist northern beef producers rather than hindering them.



The Kimberley Cattleman's Association

RESPONSE TO THE REVIEW OF THE NATIONAL BOVINE JOHNE'S DISEASE STRATEGY

DISCUSSION PAPER	KCA COMMENT
<p>1. <i>The updated national BJD strategy set aside any reference to a putative link between BJD and Crohn's disease until compelling evidence of such a link is brought forward.</i></p>	<p>AGREED There is no definitive scientific evidence of the inferred linkage</p>
<p>2. <i>The updated national BJD strategy should treat BJD in a manner analogous to that with which we apply to the management and control of other endemic animal diseases.</i></p>	<p>AGREED IN PRINCIPLE This will rely on a clear definition of endemic animal disease</p>
<p>3. <i>The updated national BJD strategy should significantly reduce (and ideally remove altogether) inconsistencies of approach between jurisdictions – inconsistencies that produce material disparities in the treatment of producers whose herds are touched by BJD, irrespective of geographic location</i></p>	<p>AGREED PRINCIPLE In principle it sound great but in reality it will be extremely difficult to implement, the States and Territory would never agree on a common treatment for producers outside of their State or Territory whose herds are touched by BJD It may be more realistic to have state industry who already have there within-border disease-management policies in place to determine the correct measures for the control of BJD</p>
<p>4. <i>The updated national BJD strategy should, in its next iteration, (a) maintain the separation between bovine and ovine Johne's disease – and thus the separation of the associated management and control strategies; (b) acknowledge the risk of such cross-infections occurring; and (c) encourage the active management of the risks involved through biosecurity education and practice improvement initiatives</i></p>	<p>a) AGREED IN PRINCIPLE On a livestock industry prospective the value proposition for them would be to oppose the proposition and remove the separation. For the cattle sector the current separation status should be maintained There is no mention of dairy? b) Agreed c) Strongly Agreed More research is required in cross infection and if infected cattle can pass on the organism</p>

DISCUSSION PAPER	KCA COMMENT
<p>5. <i>The updated national BJD strategy should articulate a clear and crisp definition of its intent and focus by: (a) distinguishing disease management and control matters, which are its unquestioned remit, from trade-related imperatives, which will vary from one jurisdiction to another as well as by type of trade; and (b) giving trade considerations their due and proper place by explaining the link (and separation) between the two.</i></p>	<p>AGREED</p> <p>We strongly support the position of DAFWA on this proposal and fully endorse their following response</p> <p><i>It is important that a national strategy should not be used as a barrier to trade by jurisdictions without rigorous scientific risk assessment and mature discussion to facilitate the final decision. By their very nature most disease control programs rely on zoning and movement controls based on epidemiological principles which may have trade implications. The true role of BJD in market access needs to be elucidated</i></p>
<p>6. <i>The updated national BJD strategy should: (a) rest on a basic tenet and default position of self- determination for producers whose herds are BJD-affected; (b) guide and assist producer self- determination through science-based, jurisdiction- consistent and trade-adjusted pathways that, if followed, allow producers to manage and control BJD in their herd; limit the spread of the disease (typically as part of biosecurity practices); and, most importantly, allow the producer to manage his or her future with neither penalty nor stigma.</i></p>	<p>AGREED IN PRINCIPLE</p> <p>The deregulation of BJD controls without fear of penalty nor stigma could be a quantum step in the wrong direction. Most producer would accept and responsible manage and control a BJD infected herd, but there will be a few that will not conform with biosecurity practices, these few could very well spread the disease or negatively impact our valuable export markets. There is a cost impose to producer that must be considered. A great deal of consultation and work still need to be done on this proposition</p>
<p>7. <i>The updated national BJD strategy should: (a) recognise the producers (rather than regulators) as owners and managers of the BJD risk in their herd(s) irrespective of jurisdiction – and thus obviate the need for the zone system in a scheme designed for disease management and control (rather than trade); (b) have government resources (including CVOs) and industry assist producers in managing the risk of BJD manifesting in a herd through biosecurity-driven education; (c) have government resources (including CVOs) and industry assist producers in managing the disease, should it manifest nonetheless; and (d) have government resources (including CVOs) and industry support producers’ viability through the use of trading pathways that recognise export trading requirements where appropriate</i></p>	<p>AGREED IN PRINCIPLE</p> <p>The comment made to proposition 6. Are also relevant to this proposition</p> <p>Notwithstanding 6. There will be a large cost impose to producer if the producer legally assumes all the risk and remedies, in turn this could also leave him open to various types of civil actions.</p> <p>Once again, I great deal of work still needs to be done on this proposition before its agreed</p>

DISCUSSION PAPER	KCA COMMENT
<p><i>8. Consistent with the producer, property and herd-focused principles enunciated earlier, the updated national BJD strategy should rely on a producer-centric responsibility structure (a) in which, in ordinary circumstances, producers are required to satisfy authorities, through independent testing, as to the fitness of their herd (or property) for the trade in which they propose to engage – particularly where export trade is concerned; and (b) in which the role of the authorities is to verify that testing and certification, and conduct supplementary, risk-based audits as they see fit; generally, provide assistance and support to producers in understanding and fulfilling the conditions that apply to the type of trade in which they wish to engage; and, where BJD manifests, to assist affected producers in maintaining such operating capacity as is open to them under the regulations governing the trading that can take place in their circumstances.</i></p>	<p>AGREED</p> <p>A) Agreed B) Agreed</p> <p>Based on the assumption that proposition 6 & 7 is further discussed and adjusted</p>



OUT15/10998

Duncan Rowland
Executive Manager of Biosecurity
Animal Health Australia
Suite 15, 26-28 Napier Close
Deakin ACT 2600

Dear Duncan

Re the Review of the National Bovine Johne's disease ('BJD') Strategy: First Discussion Paper on a recast National BJD Strategy

The New South Wales (NSW) Department of Primary Industries (DPI) and Local Land Services (LLS) have reviewed the first discussion paper. This response is a joint response on behalf of both agencies that work in partnership to deliver Government Animal Health in NSW.

Overall Comments

- NSW supports a BJD program based on self-determination for producers who have BJD suspected or diagnosed in their herds. This will work most effectively if all jurisdictions, industry peak councils and state farming organisations endorse this policy change.
- NSW notes that the vast majority of producers calling for changes to the strategy have herds that are infected or suspect and that the impact of BJD regulation is not well understood by those not directly affected. The new strategy must address the needs of these producers who have not had BJD diagnosed.
- NSW notes that this discussion paper fails to acknowledge the current National BJD Program are a joint Industry and Government program that was developed iteratively with processes similar to the current review [wide consultation, development of principles then development of detail in the form of the *Standard Definitions, Rules and Guidelines for the control of cattle strains of mycobacterium paratuberculosis in cattle and for goats, deer and camelids*, 8th edition, May 2012 (SDR&Gs)].
- NSW recommends that the recast strategy clearly document industry and Government (currently listed as "regulatory authorities") responsibilities.
- NSW notes that the discussion paper repeatedly makes mention of treating BJD as another endemic disease but does not explore the possibility of removing Johne's disease from the list of notifiable diseases. NSW recommends that the pros and cons of delisting BJD as a notifiable disease be explored and considered.

Specific Comments

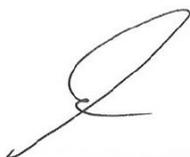
1. Towards a Recast National BJD Strategy: Four Propositions concerned with fundamentals
 - Re 1 and 2 and the purported link to Crohn's disease. NSW notes that it is important that the recast strategy should be flexible enough to include the capability to respond to any future changed information on the possible link.
 - Re 4 and endemic diseases. NSW disagrees with the suggestion that the approach taken with BJD is not consistent with that taken to other endemic diseases in this country. NSW notes that endemic diseases may be completely unregulated e.g. strongyle infestation, Bovine Virus Diarrhoea (Type1) virus, lightly regulated eg ovine Brucellosis or heavily regulated eg Virulent footrot of sheep in NSW, tick fever and anthrax. While Johne's disease remains notifiable it will remain a regulated disease.

- Re 5- NSW notes that BJD is managed and controlled as a notifiable endemic disease and that the recast program will lessen not abolish the regulatory approach unless the radicle step of removing Johne's disease as a notifiable disease is taken.
- Re 6 and 7 NSW notes that 'national' programs are implemented by states and territories.
- Re 8-10 NSW notes that the current SDR&Gs have a variety of strategies for management of BJD. In order to significantly reduce future inconsistencies of approach it will require Governments and farming organisations to agree to a single consistent approach.
- Re 17 NSW notes that S strain and ovine Johne's disease regulation still exists in Queensland and South Australia.

2. Towards a Recast National BJD Strategy: Four propositions concerned with operational matters and their underlying constructs

- NSW notes that the National BJD Forum summary identifies that certain industry groups have obtained market advantage from the current BJD program while at least some producers identified as owning infected herds have suffered significant costs. NSW also notes that the first discussion paper seeks to address this by distinguishing disease management and control priorities from trade priorities.
- NSW notes that it appears that risk-based trading for BJD has had a low adoption in the NSW dairy industry despite proven risk mitigation practices available to dairy producers that are not available to beef producers. Dairy producers remain reluctant to test because of the risk that infection might be identified even though a herd with tested low prevalence has a higher Dairy Assurance Score than a non-assessed herd. It appears that risk-based trading can only be truly successful in the complete absence of regulation (including being notifiable).
- NSW recommends that the terms "regulator" and "regulatory authorities be changed to Government.
- NSW notes that throughout this section, the responsibilities of Government and Industry are often merged (for example in 31). NSW recommends that in future papers the responsibilities of Industry and Government are identified separately.
- NSW notes re 19- the secondary distinction is enterprise rather than species driven.
- NSW notes that re 25 that BJD is described as a low toll, low local impact disease; however some NSW producers have had a significant portion of their herd develop BJD. A strategy to monitor BJD prevalence may assist producers to avoid these impacts.
- NSW notes re 35 and 36 that while BJD remaining notifiable the major beneficiaries are live animal exporters. NSW also notes that export protocols that focus on clinical signs within a time less than the incubation period of the disease, testing of animals at an age when the sensitivity of the tests available are extremely low and the disincentive to having suspicious syndromes investigated all increase the risk of BJD being exported/imported. NSW recommends that subsequent discussion papers canvass options for export that are not dependant on regulating notification of disease.

Yours sincerely



Bruce M Christie
Deputy Director General
Biosecurity and Food Safety

11 May 2015



30 April 2015

BJD Review Team
Animal Health Australia
Suite 15
26-28 Napier Close
DEAKIN ACT 2600

Dear Sir / Madam

Thank you for the opportunity to make comments on the Bovine Johne's disease review (the review).

As you may know, Malcolm Holm has been nominated to represent the Primary Industries Ministerial Advisory Council (PI MAC) on the BJD review, and attended the facilitated forum on Bovine Johne's disease held in Sydney in February 2015. By way of background, the PI MAC constitutes and represents a broad group of agricultural stakeholders from industries and communities across NSW, and provides advice to the NSW Minister for Primary Industries.

The members of the PI MAC welcomed the BJD review, and are particularly interested in the implementation of the recommendations which may arise from the review. However, with the caretaker conventions in place during the recent NSW State Government Election, and the appointment of the Hon Niall Blair MLC as the new NSW Minister for Primary Industries and Minister for Lands and Water the PI MAC is not in a position to make a submission to the review at this time.

PI MAC would welcome the opportunity to be involved in the review as it progresses, and can be contacted through their Executive Officer; Scott Seaman at: scott.seaman@dpi.nsw.gov.au

Yours faithfully

A handwritten signature in black ink that reads 'Lucinda Corrigan'.

Lucinda Corrigan, Chair
NSW Primary Industries Ministerial Advisory Council



Queensland Dairyfarmers' Organisation Limited ABN: 90 090 629 066

BJD Review Team
Animal Health Australia
Suite 15
26-28 Napier Close
DEAKIN ACT 2600
Email: bjdreview@animalhealthaustralia.com.au

3rd May 2015

Dear Review Team,

RE: Review of the National Bovine Johnes Disease Strategy and draft discussion paper

The Queensland Dairyfarmers Organisation (QDO) is the peak representative advocacy organisation for dairy farmers in the state of Queensland and consistently works at many levels for the benefit of the dairy industry in the Northern or Sub Tropical region of Australia.

The QDO enjoys strong support from dairy farmers in this state. Even though trading and seasonal conditions in this region have been challenging over the past decade or so the QDO has maintained a membership level consistently approaching seventy percent of the dairy farmers in Queensland.

Over what has been many decades now the QDO has worked with the state government departments to keep the incidence of Bovine Johnes Disease (BJD) low or non-existent in this state. This has been done with the help of dairy farmers who have at times gone to considerable effort to return or keep their herd free of BJD. As far as we are aware all of the few outbreaks we have had of BJD in the Queensland Dairy Industry have been of the Cattle or C strain of the disease and can be traced to cross border cattle movements into Queensland from southern states.

We note that the now well publicised outbreak of BJD in the Beef Cattle herd in this state was of the Bison or B strain of the disease, which as far as we are aware and have been reliably informed is not present in Australia's southern states. The QDO is not aware of any outbreak of B strain of Johnes Disease in dairy cattle in Queensland.

The Queensland Dairy Industry has maintained a very low or non-existent level of BJD in Queensland. In comparison across the border in Northern NSW where climatic conditions are very similar, we are aware that BJD has spread widely and we believe is now commonplace in dairy cattle in that region. This difference can only be attributable to the Zonal system of BJD management and the diligence of the Queensland State Government and the dairy industry in restricting movement of the C strain of BJD into Queensland. It should therefore be disappointing to all, that the beef industry and the Government did not show the same diligence in movement of cattle from sources of the B strain of the disease into Queensland.

Interestingly the discussion paper describes how there are three strains of Johnes Disease now in Australia. It says that strain S affects Sheep and C strain affects Cattle and B strain Bison, and that the strains generally stick to their species. Of course as we should all know that the whole of the recent well publicised outbreak or JD in the beef industry has been B strain, which hardly supports the notion that the strains stick to species. Even so this fact needs to be considered when evaluating the success of Queensland in managing outbreaks of C strain and not confuse it with beef outbreak which has crossed species (and an ocean) from Bison.

These are important facts to learn from in considering how Queensland including how the Queensland Dairy Industry should act as part of a review and possible recast of the National BJD strategy.

In reviewing the Johnes Disease strategy the QDO believes the first discussion paper and in fact the whole process so far is excessively focused on freeing up movement of cattle and reducing the consequences for properties and businesses that are infected with JD. While QDO believes the focus on these two issues is important it cannot be done at the expense of what has been achieved by the diligent efforts that have kept C strain of JD at an extremely low level in Queensland compared to all other Australian States with the exception of Western Australia.

The problem with the current discussion and possible proposal is that it drops everyone to almost the lowest common denominator and almost all of the Queensland Dairy Industry that have worked hard to keep a status of a what we see as a JD free herd to what would be a suspect herd for all real intent and purposes.

Over past years the Queensland Dairy Industry has worked co-operatively with producer organisations and government bodies in other states to devise the system of property scores to allow secure and safe access for cattle from other states into Queensland. QDO believes that this very workable system has obviously been vital in keeping the incidence of JD in Queensland low while allowing access of cattle into this state. As far as we can discern any problems with the system have been in the administration of the system in the southern states rather than with the system itself.

In this regard QDO supports the bringing about of greater consistency in standards, practices, management, aims and planned outcomes of the JD National Management Strategy. Key in this though is whether the National aim is to eradicate, limit, manage or simply learn to live with the disease.

This leads us of course to, why has the effort gone in over past years to keep JD out of the Queensland Dairy Industry and why do we want to keep it out in future? There have been studies which many will be aware of that show JD is of considerable impact to the Bovine industries and in particular is of considerable impact to Dairy. On top of this there are very real concerns about trade issues and limitation as many nations have restrictions pertaining to Johnes Disease. On top of this, there is the possible connection to human health. It is most disappointing that like some other parts of this review discussion many have tried to make the consideration of a possible link to human health including a connection to Croness disease a taboo topic and not even have the issue in the discussion. It must be understood by all that while a link to human health has not been proven it has also not been disproven as many who attended a recent workshop in Sydney now seem to believe. Therefore if we make the discussion of this topic taboo and there is a link confirmed then we will be caught with no plan and not even any consideration of how the problem is to be handled. In fact if this issue is not in the consideration then the outcomes of this review could well make that situation much worse than it needs to be.

One clear preparation we need to make is to have more knowledge of the disease and a greater ability to test for the disease in an accurate and time efficient manner. This would also be of great benefit in any management process for the disease. Therefore there needs to be much more research done both in detecting, limiting and managing the disease.

So as JD is clearly a disease that the Queensland Dairy industry and in fact that whole of Queensland would be much better off without, then what is the best strategy to keep the incidence low.

In this, much of responsibility for past outbreaks whether in the beef industry or in the dairy industry including whether it has been C strain or B strain has been in the transportation of stud type animals. Clearly then this section of industry needs to take responsibility for how it conducts business and how it transports stock. Disappointingly much of the discussion paper seems aimed at freeing up movements so that the industry can resume the practices that have transported the disease around in the past but now without the consequences that have resulted in the past.

It has been QDO's experience that when left to an honour type system for assuring movements of cattle that in fact there is little honour in the process. This is true even if there is supposed to be legal ramifications for those who infect innocent parties whether knowingly or not. We believe in rural industries, few buyers will check the documentation surrounding cattle movement if they are from a PIC to PIC basis, much less ask for documentation if it is not offered.

Therefore QDO believes that while it is important to improve trade and limit impacts on businesses that have not deliberately damaged other businesses this cannot be done at the expense of those other businesses, the industry as a whole or Queensland's ability to keep Johnes Disease at a very low level.

Yours faithfully,

Brian Tessmann
President
Queensland Dairyfarmers' Organisation Ltd

South Australian Response to AHA BJD Review First Discussion Paper

Introductory Remarks

The approach adopted, laying out principles first and over time moving into greater detail, is a constructive one and to be applauded.

It also appears that the new approach aims to remove the false premises on which the present program is based and to begin seeing BJD as yet another endemic disease to be managed by individual producers. This too is commended, although it seems not to go far enough (see below).

At first glance, it would appear that the final aim of this exercise is to produce what would essentially be a “watered down” version of the present BJD program. Such an outcome will not be supported by CVO SA. One of the identifying characteristics of the current program is its overwhelming complexity. The complex and cumbersome nature of the program (described with over 150 pages of text in two separate manuals) put it beyond the comprehension of the average producer. Ideally, such a program should be described in just a few pages. This necessitates a complete re-think of the approach. An amended version of the current program is unacceptable.

Apart from being characterised by complexity, the current program also adopts a very “blinkered” approach where all resources are directed at detecting/managing/removing a single disease, namely BJD. This is viewed as a waste of valuable resources and cannot be supported. The centrepiece of any new strategy must be farm biosecurity. This would take into account far more than just the presence/absence/management of a disease. It would describe and reward a suite of biosecurity measures taken to prevent the introduction of disease, prevent its spread (if present) and limit its impact (if present). Such an approach would have the dual effect of managing not only BJD, but a variety of other production-limiting conditions. The same resources would thus be used to much broader effect. This kind of approach would be supported by CVO SA.

The role of government veterinary services in any new program would be limited to two areas of activity only:

- Provision of technical advice
- Property-level certification (cost recovered) for trade purposes

With regard to the development of a new national biosecurity program, it would appear that this development is largely in the hands of government and industry officials. This approach is too far removed from on-the-ground reality.

A developmental approach is favoured which:

- Does not include developers or designers with any previous involvement in the development or implementation of Johne’s disease programs. Fresh eyes must be brought to bear on this issue.

- Involves extensive ‘reality testing’ using real producers (preferably commercial producers) to assess its practicability.

Comments with respect to Essential Reference Marks

This section of the document summarises the inconsistencies, illogicalities and “pain” of the national BJD program in its present form. Moving from a notional and essentially dysfunctional national approach to a producer-empowered approach is strongly supported.

BJD status has no effect on product exports. It is relevant only to live trade; and in this case, all that is important is the status of the farm of origin. Zonal status has never played a role in trade. To the extent that a new BJD program aims to clarify and manage property status, it will provide sufficient support for trade, provided that the producer is able to show the evidence that supports his/her claimed status.

The money and effort that has been put into BJD research in Australia has been disproportionate to the actual importance of the disease. Supporting ongoing research is not a priority. These resources would be better applied elsewhere.

While “B”, “C” and “S” strains may well be genetically distinguishable, the strain category to which the organism belongs does not predict its behaviour with respect to epidemiology or pathogenicity. By extension therefore, the strain type detected cannot be allowed to affect the choice of management program. There is a need to align Australia with the international (OIE) position whereby paratuberculosis is paratuberculosis regardless of the species of animal infected.

A new program should not have BJD as its focus. *In fact, the new program should not even have the words “BJD” or “Johne’s disease” in its name.* There is no need to single out this disease for special attention when farmers are grappling with a wide range of endemic diseases and biosecurity issues, many of which have far greater impact than BJD. The words in the discussion document “Approach the management of BJD as part of a wider, better-integrated biosecurity promotion, education and management effort” are the only mention of such an approach which should, in fact, be a recurring theme throughout the document. SA CVO will not support a “single disease” approach. Any new program contemplated must be a biosecurity program with BJD as a minor component at most; not a BJD program with a little lip service to farm biosecurity.

Comments on Four propositions concerned with fundamentals

The “link” between BJD and Crohn’s disease is imaginary and has largely been created through the use of junk science. It is in any case not up to the animal health and production fraternity to make the call as to whether or not BJD is a public health issue. Whether or not any future strategy for BJD management is introduced must not be influenced by a bogus debate around public health/zoonosis considerations.

BJD is just another endemic disease – like IBR, internal parasites, etc. In fact, its real production impact is very much lower than many other endemic diseases. As such, it should be the target of a voluntary, producer-based approach which allows the producer to make all decisions respecting prevention and management of the disease. Giving producers free rein will eliminate the need for governments to get involved in enforcing a “national” approach.

The “separation” of bovine and ovine JD must not be based on strain differences but on the species affected. Management will perforce be different, not because of the nature of the organism, but because of the nature of the host. A property where JD is known to be present is infected regardless of either the strain identified or the host species present.

Comments on Four propositions concerned with operational matters

Market access for live animals is currently linked to individual property status. Nowhere else in the world do BJD “zones” exist, nor does any trading partner recognise or require such zones. It appears likely that the construct of zones and their imagined importance was created to justify the ongoing existence of the current program. While Queensland was thought of as a “protected” (notionally free) zone, it never was: the discovery of BJD in Queensland arguably some decades after its introduction demonstrates that amply. JD is well able to “fly below the radar” undetected and in a hypoendemic state for decades. While semi-arid areas in any part of the world are almost invariably free of clinical disease, the infection (i.e. the subclinical presence of the organism) is close to ubiquitous. It will never be possible to conclude that any part of Australia is free of BJD. No future program should be based on the erroneous concept of area-wide disease freedom. It may indeed be possible to classify individual farms as having a low risk of BJD, but freedom is not possible.

A future program must be holistic in nature; not disease-focused. It must contain means of measuring both biosecurity practices and risk of disease (not just BJD). There must be clarity around what parameters indicate a low risk of BJD – i.e. what proof is required for animals originating from a property to be thought of as unlikely to transmit disease. This will satisfy live trade requirements.

Biosecurity measures on-farm as well as specific disease management must be entirely within the volition of the producer. The concept of “producer self-determination” as presented in the discussion document is entirely appropriate. Producers should be willing to declare their status (both in terms of biosecurity measures applied and in terms of disease status) prior to sale. Where they make such declarations, they should also have the evidence available to support their claims. Any future national program must propose the framework within which such claims are made.

Territorial constructs (such as protected zones and management zones) must be abolished entirely and replaced with a voluntary farm classification system (based on biosecurity practices and disease status as outlined above). The farm classification may be declared by the producer on selling stock as a means of encouraging the practice of “like trading with like.”

Government involvement must be kept to an absolute minimum. The ideas floated in the discussion paper (“have government resources (including CVOs) and industry assist producers in managing the disease” along with audits and trace-backs) are alarming. Government resources *per se* cannot be allocated to such functions; this immediately sets BJD apart as a disease deserving of special attention. This kind of work must be paid for with industry resources. This must be determined on a jurisdictional basis. Industry bodies within a jurisdiction may well decide that some management assistance is necessary, but they will need to contract and pay a suitable service provider to do this. In some cases, this may well be asked of government, but the essential point is that industry would then have to pay government for these services as it would any other service provider.

Government should in no way favour BJD above any other disease in terms of giving out information or rendering technical assistance.

There is no impediment to government certifying property status based on producer evidence provided; such work is a government function. However, there should be a producer pays paradigm in operation here such that the producer pays the government for certification services.

South Australian position in summary

SA CVO will NOT support:

- A program with a single disease focus
- A program that is complex and cumbersome
- A program that commits government resources to managing an endemic disease
- A program that perpetuates zoning
- A program that fosters the concept of various species-linked strains of Johne’s disease

SA CVO WILL support:

- A voluntary program with a farm biosecurity focus
- A program that empowers producers to deal effectively with endemic diseases
- A program that enables BJD status and management to be determined by individual producers
- A program that acknowledges the epidemiological reality of the multi-host propensities of all JD strains
- Government provision of technical advice on BJD and other biosecurity matters
- Government property auditing and/or certification only against cost recovery

Dear BJD Review

you ought to be congratulated on the progress of review thus far.

I have one comment on the discussion paper, w.r.t. the recast strategy fundamentals – par. 20 on p.12:

“we propose that:

The updated national BJD strategy should, in its next iteration, (a) maintain the separation between bovine and ovine Johne’s disease – and thus the separation of the associated management and control strategies . . .”

My recollection of the discussion in the workshop is different:

- At best, the sentiment was that the motivation for continued distinction of the strains in a control program should be investigated.
- At worst, the distinction should be abolished and JD should be JD, regardless of "B", "C" or "S"

I shall be happy to be corrected if my recollection is flawed, but would appreciate some further consideration of this point.

With best wishes

Johann Schröder

R&D Project Manager: Animal Health, Welfare & Biosecurity

Meat & Livestock Australia

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Foreword and Introduction.

Recast BJD strategy – is one needed? Assess against a “do nothing” scenario.

Propositions/rationale for debate – all the reasons as to “why things are as they now “ given the passage of considerable time with the existing strategy need to be exposed, detailed and shared with all attendees. This is not the case in the current document.

Membership of the Reference group [along with organisation/Position/Responsibilities & accountability] needs to be made public.

Outcomes of the second workshop [Reference group] should be made available to all the 16th Feb attendees if openness and transparency is to be an underpinning intent of the whole review process. In the absence of this information the outcomes cannot be assessed against the intent and purpose of the review i.e. the Review will lack any credibility. Why base the advancement of the review on the record of 2 meetings when the majority of the 16th Feb attendees have no access to the record of the second meeting?

Change and open mindedness? – refer to the above.

Essential Reference Marks.

Point 2:

Agree entirely, but note the above comments which point out issues that are already of concern in the process.

Point 4:

Agree. The current processes for control and management of BJD, assessment of property disease status, certification for export etc. are anything but open, consistentas is the case with other diseases. In many cases they are not evidence and science based which in itself gives rise to lack of standardisation of testing, reporting, interpretation and documentation.

Point 6:

The need for the endemic BJD to be a notifiable disease needs to be questioned even in view of the current livestock export protocols. The current AQIS, AQIS Accredited Veterinarian [AAV] certification process for live export shipments as to disease freedom is seriously flawed and misrepresents the true property disease status. No testing or inspection of the property of origin has been undertaken by the AAV – usually a single inspection of the consigned animal in the pre-embarkation quarantine facility.

“Light touch regulation” – something is either regulated with adequate and meaningful [resourced – personnel, \$, authority] monitoring, management and enforcement or not regulated. “A little bit pregnant” comes to mind. Self-regulation within industries has been an abject failure as industry organisations have not brought errant members to heel to the detriment of the whole industry.

Anomalies and inconsistencies, particularly at the State government level have been demonstrated since the quarantining of properties as a result of the Rockley BJD diagnosis. “Jurisdiction- based regulations with those obligations and their interpretation” – There is fierce between-State competition with a “whatever it takes attitude” to secure the live cattle export trade on behalf of their producers. This is unlikely to change.

Towards a recast National BJD strategy.

Four propositions concerned with fundamentals

Point 4/5: Agree. BJD becomes a non-notifiable endemic disease with livestock export protocols to individual countries being renegotiated by DAFF. This would include other endemic disease certification to be addressed concurrently.

Point 6/7: Clearly not the case currently. Individual producers are treated quite differently with the producers who have potentially disease limiting thoroughly investigated [with an adverse result] being severely disadvantaged while their untested neighbours profit handsomely through certification based on the “absence of evidence”.

Point 8/9/10/11: See Section above. “Whatever it takes”. SDR&Gs become meaningless and as BJD is not a production limiting disease in beef cattle. The SDR&Gs become the limiting factor. Also see “light touch regulation” Point 6 above Section.

Point17: BJD is an inhibiting factor in export only because of the existing protocol requirements. BJD was known to be endemic [along with a number of viral diseases in cattle] well before any negotiation of any protocols by DAFF. It was also known that there were not any national “test/control/eradication programs for these diseases in place in Australia so that creditable certification processes for export could be drawn on. Even so, there are significant R&D findings in the past 20 years that clearly indicate the geographic spread and property prevalence of some of the endemic diseases that affect the current certification processes in the livestock export sector.

Four propositions concerned with operational matters and their underlying constructs.

Points 1/2/3: “legitimacy of trade considerations”.

‘Translation of BJD management in various jurisdictions”

Refer to comments in above sections.

Points 7/8: See earlier comments. What would the need/motivation/incentive be for any producer to undertake any investigation/testing? None whatsoever!

Point 12: See earlier comments re the treatment of those producers who test and receive an adverse result verses those who don’t test who are deemed non-infected/no signs of clinical disease and can trade/export unchallenged. “Evidence based health statements”?

Points 14/15: Agree with the sentiment and intent but this is based on some bold assumptions given the current situation.

Point 28: In future resourcing of activities with any scenario needs to be examined. The Cattle Disease Contingency Fund [CDCF] which was set up from industry producer funds [surplus producer funds from the BTEC scheme] has been “drawn down” by the allowable 10% of funds and as such funds were not/would not be available to BJD issues without re-visiting “permitted purpose” use of the CDCF.

Point 29: Unclear as to how the stated advantages flow from the Point 28 proposition.

Point 30: The current export/certification processes for a number of endemic diseases including BJD are dysfunctional and misrepresent the true disease status given that “absence of evidence” underpins much of the certification.

Point 31: Mutual obligations, trust, removal of penalties, immediate compensation when all the “biosecurity measures” have been implemented by an “infected property” etc. There is serious trust deficit currently that has to be addressed as a precursor of moving forward.

Regulatory Authorities – Trading Activity.

Certification by the regulator – see earlier comments. AAV are not independent as they are employed by the exporter [no certification – no future work for the exporter and unlikely to get work from other exporters] certify animals based on inspection in the pre-embarkation quarantine centre and information [by interrogation of database of PIC* disease test] held by the individual State Animal Health Laboratories. In the majority of cases no tests for disease a,b,c or BJD have been conducted in the past 12 months or other time period designated in the relevant protocol. . “Best/current science and latest technology” have never been a consideration in the certification process.

“Audits” by regulators on regulators are regarded poorly. AQIS currently audits “AQIS personnel, processes and procedures’ in the livestock export sector when complaints are made. No meaningful sanctions e.g. loss of licences etc. have ever been imposed.

Point 34: “Independent testing”. Issues around standardisation of testing protocols (selection of tests, interpretation of results, reporting, ownership and management of disease testing information has been raised on numerous occasions with key organisations and personnel – Animal Health Committee[AHC], Sub-Committee Animal Health Laboratories {SCAHLs} and others to no avail. Full cost testing is now the norm with the majority of the State Animal Health Labs. Results are readily made available to exporters on request for those who utilise the State service. “Street-smart operators” use private test/pathology labs and retain results and the confidentiality of those results – good and bad. They don’t unnecessarily jeopardise producer businesses when interpretation of results varies depending on who assesses them.

Point 35: At an appropriate time ALEC [Australian Livestock Exporters Council] should be consulted re proposals in relation to exports and certification procedures. Suggest sooner rather than later given current practices in the export industry.

While some of the above maybe seen as "jumping the gun", there are important issues that need further investigation/development before progressing too far down any track.

David Skerman.



Professor Richard Whittington
Chair Farm Animal Health

2 May 2015

BJD Review
Animal Health Australia
bjdreview@animalhealthaustralia.com.au
Suite 15, 26-28 Napier Close, Deakin ACT 2600

Dear Chair, BJD Review

**RE: First Discussion Paper on a recast National BJD Strategy
-your request for comments by e-mail 13-4-15**

This statement addresses only those issues for which there is scientific evidence

1. The style and bias of the document favours issues for producers with BJD in their herd (entire document)

- The discussion paper drives a strong agenda for change, and claims to represent a valid starting point for a series of propositions based on views agreed in prior workshops. However, the discussion paper is characterised by colourful, powerful and complex language, and in places this seems to be used in a deliberate attempt to call into contempt certain evidence. In so doing an unwelcome new jargon has been created compared to the prevailing language of animal health in Australia. This conceals matters related to reasonable balance and perspective.
- There is particular emphasis on needs of producers who may already have the disease in their herd, and relatively less emphasis on needs of producers who do not already have the disease in their herd. Based on scientific evidence about BJD distribution and prevalence in cattle herds in Australia, the latter outnumber the former, and a request for rebalancing of the document would not be unjustified.

2. Assumptions about limited clinical impact may be incorrect (page 6 point 5 and page 19 point 25)

- Sub-clinical and clinical impacts of BJD have not been measured accurately in Australia, although modelling of economic impacts related to

some aspects of the disease in cattle have concluded limited economic impact.

- Sub-clinical and clinical impacts are related to prevalence, and the age at which the impacts are first manifest are driven by infectious dose, which itself is related to prevalence. Studies in other countries in a range of species suggest that impacts become worse with time and can be severe, manifest by the producers' tolerance for losses being exceeded.
- Prevalence increases over time if the disease is not controlled, and therefore production losses also increase over time.
- The timeframe over which prevalence increases is measured in decades not years, but eventually there is an exponential phase where losses become obvious to producers and can be substantial. This phase was reached in some sheep flocks in some areas of NSW in the 1990s, before the disease was brought under control by vaccination and other measures. This phase has been observed in cattle in other countries with a longer history of BJD than Australia. It has been seen also in goats and deer.
- Due to the long time frame, today's decision makers will likely not have to explain their decisions to anyone tomorrow. It will be the next generation of farmers who ask questions.
- Recently published research on OJD in Australia revealed significant but unsuspected losses in body condition of infected animals compared to controls in the same flocks. Data and images from AHA's own files document substantial carcass condition losses associated with OJD. OJD is a good model for BJD in beef. These data indicate that failure to control BJD, leading to progressive spread and increased prevalence, will have a measurable impact on the returns from beef production.

3. Links between BJD and Crohn's disease are downplayed (page 6 point 6 - 3rd dot point; page 8 points 1,2)

- This is a complex issue but if the BJD review is to have the basis in science that it purports to have, then some facts need to be addressed
- BJD is caused by *Mycobacterium paratuberculosis*
- *Mycobacterium paratuberculosis* has been isolated from human patients with Crohn's disease. This has been reported from Australia and overseas. Patients have ranged in age from children to adults. The organism has been isolated from intestinal tissues and also from breast

milk from these patients. There is overwhelming evidence that *Mycobacterium paratuberculosis* can and does infect humans, both children and adults.

- Meta-analyses (critical reviews of multiple published studies) have concluded that there is a statistically significant association between *Mycobacterium paratuberculosis* and Crohn's disease.
- All isolates of *Mycobacterium paratuberculosis* from humans have been typed as C strain (i.e. like those from BJD)
- In science (epidemiology), an association is not proof of causation.
 - This is an important point and a comfort that the livestock industries can take from the published literature.
 - It is the distinction between association and causation that enables human health authorities to state that Crohn's disease is not caused by *Mycobacterium paratuberculosis*, but it is the association that dissuades them from ignoring the issue.
 - The association is the reason, stated or unstated, that animal health authorities worldwide maintain a watching brief on JD for their human health counterparts in government.
- The wording used in the review document such as "vague fear-shadow" is highly misleading. To ignore the association between *Mycobacterium paratuberculosis* and Crohn's disease in the scientific literature would give the BJD review about as much international credibility as the federal government's current stance on climate change.
- It is advisable that this issue not be 'set aside'. The National BJD Strategy should acknowledge the unproven zoonotic potential of *Mycobacterium paratuberculosis*.
- There is need for an on-going, unbiased review and monitoring of the scientific literature relating to the association between *Mycobacterium paratuberculosis* and Crohn's disease as it is highly likely that more evidence for and against will emerge.

Strains of Johne's disease (page 7 - 4th dot point; page 11 point 13; page 12 proposition)

- Currently there is a lack of understanding regarding the pathogenicity of the different strains of *Mycobacterium paratuberculosis* across species. Further research is required.

4. *Use of quarantine to control epidemics* (page 16 point 9)



- This well-established approach to disease control is covered by the science of epidemiology. Quarantine approaches are not limited to dangerous epidemics, are not last resort approaches, and nor are they limited to acute, fast moving diseases. However, to be effective quarantine needs to be based (among other things) on the capacity to accurately define the distribution of the disease (i.e. that the disease is within the quarantine boundary and not outside it, or there is no point).

5. Consistency of approach with other endemic diseases and consistency of application (page 9 point 4; page 9 point 6)

- There are other examples where science-based regulatory approaches including notification and quarantine are applied to endemic disease, for example ovine virulent footrot.
- There are other examples where consistency of application is not uniform between the states, for example, ovine footrot.
- As there are animal movements between states, the potential for inconsistency in application between states is a bigger issue than the inconsistency of approach between BJD and other endemic diseases.

Yours sincerely,

A handwritten signature in black ink that reads "R. Whittington".

Richard Whittington

also on behalf of Dr Karren Plain and Dr Kumi de Silva

1 May, 2015

BJD Review
Animal Health Australia
Suite 15, 26-28 Napier Close,
Deakin ACT 2600

BJD Review team,

BJD Review

The Victorian Farmers Federation Livestock Group thanks the BJD review team for the opportunity to comment on the *Review of the National Bovine Johne's disease ('BJD') Strategy: First Discussion Paper on a recast National BJD Strategy*.

The VFF Livestock Group recommends:

1. We should refer to the disease as JD not BJD as this would help to de-stigmatise the issue and to recognise cross-contamination exists between sheep and cattle. Therefore page 12 of the recast BJD Strategy should read:

The updated JD strategy should in its next iteration (a) acknowledge the risk of cross-infections occurring; and (b) encourage the active management of the risks involved through biosecurity education and practice management improvement initiatives.

2. Any reference to Crohn's disease should be handled cautiously when associated with livestock production and human health.
3. More farmers would contact a vet in regard to suspected JD cases if there was not mandatory reporting. The VFF knows of several farmers who went underground because of mandatory reporting. However these same farmers would be willing to work on managing and controlling the disease if they were not stigmatised through mandatory reporting.
4. There seems to be a lot discussion about producers who have been identified with JD on their farms and are acting to control the disease. But there are many who refuse to recognise they have JD on their properties and are refusing to take action. As already stated we need to de-stigmatise the disease and find a pathway that encourages these producers to manage and control the disease.
5. We need to work towards a consistent national approach to Johne's Disease, rather than the current approach which hampers interstate trade of seed stock.

If you have any queries in regard to the VFF's response, please contact VFF Livestock Councillor Chris Wallace-Smith on 0427 861 636 or VFF Policy & Commodities Executive Manager Peter Hunt on (03) 9207-5523.

Thankyou,

Peter Hunt

Executive Manager Policy & Commodities
Victorian Farmers Federation



Department of Economic Development, Jobs, Transport & Resources

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FIRST DISCUSSION PAPER ON A RECAST NATIONAL BJD STRATEGY

Thank you for the opportunity to provide a submission on the first discussion paper on a recast National Bovine Johne's Disease (BJD) Strategy (dated 13 April 2015).

The wording of the discussion paper is somewhat ambiguous making it difficult to understand what is being proposed as the future direction for the national approach to BJD. Consequently, the paper can be interpreted as presenting a range of approaches, from deregulation through to a fully regulated approach, without providing clear and defined alternative proposals.

The discussion would also benefit from a greater consideration of the implications of any proposed change for those herd owners who currently do not have infected animals.

The paper also appears to assume a continuation of the National BJD Strategy and alternative approaches do not appear to have been considered. Whilst accepting that we need to manage any change to the status quo, no argument is provided to support the continuation of a BJD national strategy, whilst other endemic cattle diseases that have equivalent trade implications as BJD, such as bovine viral disease (BVD) / pestivirus, do not.

To put this inequity into perspective, a study recently published by Meat & Livestock Australia Limited estimated the annual cost of BJD, as a result of production losses, preventive costs and treatment costs, to be 2.5% (\$2.8 million) of the annual cost of BVD virus (\$114.4 million) for the Australian red meat industry¹. Based on this economic assessment, the study prioritised 17 endemic diseases and conditions of cattle for the Australian red meat industry, with BVD and BJD being ranked as number two and seventeen respectively.

¹ Lane, J, Jubb, T, Shephard, R, Webb-Ware, J, and Fordyce, G (2015). Priority list of endemic diseases for the red meat industries B.AHE.0010. Report prepared for Meat & Livestock Australia, North Sydney.

A deregulated approach for the future management of BJD in Australia continues to be Victoria's preferred approach.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C Milne', written in a cursive style.

Charles Milne
Chief Veterinary Officer

01 / 05 / 2015

Submission

Towards a Recast National BJD Strategy

To:
BJD Review Team Animal Health Australia

May 2015

Prepared by WAFarmers Federation

Contact: Kim Haywood

Executive Officer - Policy

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The Western Australian Farmers Federation 125 James Street GUILDFORD WA 6055 | PO Box 68 GUILDFORD WA 6935

Agriculture in Western Australia

The Western Australian Farmers Federation Inc. (WAFarmers) is the State's largest and most influential rural advocacy and service organisation. Founded in 1912, WAFarmers boasts a membership of over 4,200 farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$5.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land.

WAFarmers Federation welcomes the opportunity to provide comments to this preliminary discussion paper and looks forward to further engagement in this process.

WAFarmers comments to the first discussion paper on a recast national BJD strategy:

1. Proposal:

The updated national BJD strategy set aside any reference to a putative link between BJD and Crohn's disease until compelling evidence of such a link is brought forward.

Response:

WAFarmers supports the aligning of this suggested "public health risk" with the management and control of BJD.

2. Proposal:

The updated national BJD strategy should treat BJD in a manner comparable to that which applies to the management and control of other endemic animal diseases.

Response:

WAFarmers does not support this proposal. The discussion paper assumes that a common endemic disease is disease of animals throughout Australia rather than a disease that commonly occurs in a geographical region. BJD is not "endemic" to WA or to WA animals and consequently deserves to be treated in a similar manner as other diseases or pests that do not exist in WA. As such, further discussion with open and adequate surveillance is needed to better address the correct national picture in regards the prevalence of BJD management in Australia.

3. Proposal:

The updated national BJD strategy should significantly reduce (and ideally remove altogether) inconsistencies of approach between jurisdictions – inconsistencies that produce material disparities in the treatment of producers whose herds are touched by BJD, irrespective of geographic location.

WA Response:

WAFarmers agree to this proposal in principle. As this is a National strategy, harmonisation of approaches between the jurisdictions would be ideal. However, this does not address the need in Western Australia to maintain low prevalence areas of disease, which is based on a

geographical location. All current WA movement conditions relating to BJD (with one exception – from QLD) are consistent with the national BJD program.

4. Proposal:

The updated national BJD strategy should, in its next iteration, (a) maintain the separation between bovine and ovine Johnes disease and thus the separation of the associated management and control strategies; (b) acknowledge the risk of such cross-infections occurring; and (c) encourage the active management of the risks involved through biosecurity education and practice improvement initiatives.

Response:

WAFarmers agree to this proposal. Further research is needed to determine the risk posed through cross infection of different strains and the transmission of a strain, for example S strain, between bovine to bovine. There is evidence to suggest that cattle can be infected with S strain, but more work is needed to determine the potential for cattle infected with S strain to shed sufficient quantities of organism to infect other cattle and sheep.

5. Proposal:

The updated national BJD strategy should articulate a clear and crisp definition of its intent and focus by: (a) distinguishing disease management and control matters, which are its unquestioned remit, from trade-related imperatives, which will vary from one jurisdiction to another as well as by type of trade; and (b) giving trade considerations their due and proper place by explaining the link (and separation) between the two.

Response:

WAFarmers agrees to this proposal. Where ever there are diseases of trade significance there must be clear distinction between disease management and control within jurisdictions, and meeting trade related compliance conditions to avoid losing market access. It is important that changes to the national BJD strategy should not compromise or be used as a barrier to trade by jurisdictions without rigorous scientific risk assessment and mature discussion to facilitate the final decision. By their very nature most disease control programs rely on zoning and movement controls based on epidemiological principles which may have trade implications. The true role of BJD in market access needs to be elucidated.

6. Proposal:

The updated national BJD strategy should: (a) rest on a basic tenet and default position of self-determination for producers whose herds are BJD-affected; (b) guide and assist producer self-determination through science-based, jurisdiction consistent and trade-adjusted pathways that, if followed, allow producers to manage and control BJD in their herd; limit the spread of the disease (typically as part of biosecurity practices); and, most importantly, allow the producer to manage his or her future with neither penalty nor stigma.

Response:

WAFarmers suggest this proposal needs further clarification and discussion. At present it is proposing that the management and control of BJD should be deregulated, and a producer of a BJD affected herd should be able to take responsibility for the control and management of BJD without regulatory impacts, penalties or stigma. The realities dictate that there will be penalties regardless of disease regulation when taking into account trading cattle to different markets. How producers manage this as a deregulated disease would rely on an effective industry program assisted by government jurisdictions along clearly defined roles and responsibilities. Industry and Government need to agree firstly on whether BJD should be

nationally deregulated. After this has been decided, this proposition can then be discussed. Producers in WA have indicated they would like to maintain its BJD free zone.

7. Proposal:

The updated national BJD strategy should: (a) recognise the producers (rather than regulators) as owners and managers of the BJD risk in their herd(s) irrespective of jurisdiction – and thus obviate the need for the zone system in a scheme designed for disease management and control (rather than trade); (b) have government resources (including CVOs) and industry assist producers in managing the risk of BJD manifesting in a herd through biosecurity-driven education; (c) have government resources (including CVOs) and industry assist producers in managing the disease, should it manifest nonetheless; and (d) have government resources (including CVOs) and industry support producers' viability through the use of trading pathways that recognise export trading requirements where appropriate.

Response:

Again this is suggesting the control and management of BJD should be deregulated and give producers and industry ownership of BJD control and management. It is effectively stating that zoning and the low prevalence areas should be abolished which is not supported by some sectors of industry.

8. Proposal:

Consistent with the producer, property and herd-focussed principles enunciated earlier, the updated national BJD strategy should rely on a producer-centric responsibility structure (a) in which, in ordinary circumstances, producers are required to satisfy authorities, through independent testing, as to the fitness of their herd (or property) for the trade in which they propose to engage, particularly where export trade is concerned; and (b) in which the role of the authorities is to verify that testing and certification, and conduct supplementary, risk-based audits as they see fit; generally, provide assistance and support to producers in understanding and fulfilling the conditions that apply to the type of trade in which they wish to engage; and, where BJD manifests, to assist affected producers in maintaining such operating capacity as is open to them under the regulations governing the trading that can take place in their circumstances.

Response:

This again is stating that the control and management of BJD should be deregulated and give producers and industry ownership of BJD control and management.

In Summary:

WAFarmers believes it is neither achievable nor necessary to get complete national consensus on how to manage BJD because in the end each jurisdiction will impose their own rules through their respective legislations.

We are concerned the timetable for changes to be implemented is slipping.

The paper appears to support national deregulation without considering the needs of low BJD prevalence areas. It portrays the current situation as gross over-regulation without considering the benefits to those producers in the current low prevalence areas.

It also does not deal with what effect a nationally deregulated BJD environment would have on export markets, which is of importance to the Western Australian livestock industry.

Finally, the discussion paper does not take into consideration a review of the compensation arrangements needed to support businesses currently under restrictions for BJD, particularly given the long term implications of these restrictions on businesses.

AHA BJD Review - thank you for the opportunity to comment on the first draft review document following the February forum.

Whilst I understand this is a work in progress on a vexed issue for many I offer the following general comments as a commercial producer of sheep and beef cattle, plus being informed by my veterinary career in disease diagnosis, research in general and in disease control, with a bias now to stopping spread to the many unaffected beef herds in the nation. The latter also from our enterprise having experienced OJD as a result of collateral damage from disease on other infected properties and the sheep industries inability then (2000 -2001) to come to grips with serious disease spread - including deregulation on the premise of freedom to trade and the then stated aim of some stud owners " that this matter will only be solved when everyone has the disease" in the naive and mistaken and foolish view that the consequences would be modest to insignificant and that they should not suffer loss or stigma.

My first comment then is that at least in NSW parties trading livestock for re-stocking should meet the requirements of the Fair Trading Act which has been tested legally I understand and shown to apply to the sale of diseased livestock as constituting unfair trade with legal liability applying. Thus common law is operative independent of any disease control legislation and thus self-determination (operational proposition 2) cannot be both basic and the default position. This and other endemic diseases are subject to law as a self-evident public good, even if no disease control legislation is operative in future.

As by volume local and regional trade (v's different export issues) carries higher risk to industry(and has been the principal reason for widespread and relative rapid spread of OJD in the sheep industry) the issue of preventing those risks resulted in the Beef Only trading mechanism from Victoria to the North and was lobbied for by CCA with a wise eye to preventing disease spread from the high risk dairy compartment to the documented low risk beef sector both in Victoria and definitely beyond. In my view the discussion paper has not yet dealt with any specifics of stock/disease regulation nor is what sensible and "light" regulation may mean nor what is the purpose for which it must be fit. Self -determination is more likely to equate to unfettered self-interest than it is to selfless prevention of disease spread and the inexorable productivity damage or increased costs of any disease incursion are inflicted on other herds/properties/owners.

Next the document confuses many aspects of disease e.g. all endemic diseases are NOT created equal and are not therefore to be directly compared on a biological consequences or appropriate control or cost/benefit style basis. (Proposition 2 is flawed.)They are by definition not EXOTIC and high risk/cost. Thus endemic disease prevalence, disease process, severity and outcome will all differ with the specific disease and will need to be addressed differently as they should to be of benefit to producers and the limitation of the cost(s) of each. There can be no inherent consistency in responses because of the biology and to argue for that is simplistic and a fallacy. The paper should stick to Johnes Diseases of livestock and BJD in particular and put aside spurious logic and so called consistency with respect to other diseases. The veterinary profession did not misplace its concern raised now over some 80+ years with respect to BJD (more recently OJD) and there is evidence that

failure to deal in any way with the biological realities of BJD/OJD may well over time bring business failure to individual herds.

Similarly the disease epidemiology in differing geographies has and will continue to determine and compound with State jurisdictional differences and compound so called inconsistencies which are inherent in situations and strains and reasons for the presence of disease, and not in a perverse intent to confuse or frustrate industry. The red meat industries need to invest in better understanding, surveillance and monitoring at property by property level to gain and exercise control with informed risk management. It is most noticeable that whilst this report calls for better biosecurity to help industry into the future many are seeking to discredit and downplay the best tool already set up to do this, namely the Market Assurance Programs because many see trading assured healthy livestock as an unnecessary impost and not a moral and legal obligation of the right to trade breeding livestock in itself. This program needs to be strengthened and all parties up-dated with recent research output and training to multiply the benefits into the future of MAPs.

More specific comments:

Setting aside Crohn's disease (industry needs to meet customer expectations at the highest even an "unreasonable" level to sell food safe product) is impossible as the Genie is out and will not be put back in the bottle. Consistency is illusory if the disease expression differs geographically hence proposition one and three are flawed.

Keeping BJD and OJD separate may be attractive I agree but future research and reality may serve to contradict this proposition which I accept for the time being as submitted for discussion.

Operational propositions:

Proposition 1 runs the risk of confusing types of trade but this starts to be addressed more in the assumed future section where local, regional, national and overseas trade are at least distinguished. However whether trade at any cost/outcome trumps disease prevention/control is unclear as the links and separations between the two are not in any way defined as yet.

Proposition 2 should not exult self-determination at the expense of public responsibility beyond the farm gate. The stake owner will always ultimately be the determining party but only within the broader context of public responsibility at law which cannot in any way be assumed as a given. Cases of deceit and self-interest have already clouded the history of management of BJD/OJD, thus regulation may not be abandoned lightly or without consequence as equally it should not be applied ignorantly nor without reasoned/reasonable basis in fact. The no consequences call for complete deregulation is in my view nothing more than naked self-interest. Let people trade for slaughter only if they cannot meet their obligation to provide a high level market assurance for disease free breeding stock.

Proposition 3 is complicated and with multiple undefined and multi-party mutual obligations in which state it seems unworkable. In the sole respect of trade it should contain an obligation that limits intra-national trading of breeding stock to other producers to those of assured (preferably MAP) or at least defined equivalent known status and risk and premised on full legal disclosure NOT caveat emptor!!!

Proposition 4 assumes a level of action by "authorities" which I do not believe is evident in the shrinking reality of DPIs nationwide in the last decade and certainly with respect to Johnes Diseases in general and OJD in particular. The SD&Rs for cattle are an exception rather than the rule with CVOs and AHC. Elsewhere industry has been left to determine and fund attempted mechanisms to deal with these diseases and I warned at the workshop of the danger of assuming any level of sustained and certainly enlarged Government commitment to laboratory, field or socio-economic services in this area. The evidence of the existence of the F/Non- Financial support program by CCA is a testimony to this reality. Unless industry demands a viable regulator in the development of this strategy they may well receive "deregulation" by default and all the nastier (likely disease ridden) consequences of a "free for all" market-place.

Thank you and I look forward to the second more mature considerations of the reference group.

Dr Keith H Walker
Telnor Glen Partnership
Oberon NSW