

Responses to Framework Document 'BJD – Where to from here?'

Australian Brahman Breeders' Association Ltd

Australian Dairy Farmers & Dairy Australia

AgForce Queensland

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Baxendall, Sandra

Brooks, Grant

Campbell, Angus

Campbell, Bruce

Cattle Council of Australia

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Submission to BJD National Review

The Australian Brahman Breeders Association supports the approach outlined in the Framework Document released on November 2.

Our submission to the February review meeting recommended a deregulated approach and on farm biosecurity responsibility for management.

We also recommended that all three strains of JD C, B & S all be recognised as capable of causing infection and we recommended an improved National Herd Health statement which identified JD risks.

We recognise the position taken in the document regarding compensation is based on the absence of quarantine, we believe there is still a compelling argument for a National Biosecurity Fund.

It is our belief that a fund should be available to pay costs associated with a producer who becomes infected, and chooses to eliminate the infection.

This would be a major incentive in reducing the amount of infection.

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General Manager

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21 November 2015

Mr Duncan Rowland
Executive Manager Biosecurity
Animal Health Australia
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BRADDON ACT 2613

Dear Duncan

BJD Framework Document for the new approach to the management of Johne's disease in cattle

The dairy industry welcomes the opportunity to contribute to the development of a fresh approach to the management of Johne's disease in cattle following the review of the National Bovine Johne's Disease Strategy. This is a joint submission from the Australian Dairy Farmers Limited (ADF) and Dairy Australia on behalf of the Australian dairy industry.

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

The BJD Framework Document outlines fundamental objectives and general principles for the new approach which are supported by the dairy industry. This is a high-level framework that is coherent and risk-based. The new approach is flexible and attempts to make provisions and support for producers to take control according to their business needs. It also provides for groups of producers with similar status and needs to make collective biosecurity arrangements. Such groups may seek assistance from jurisdictions for implementation of these arrangements.

The recast National BJD Management Strategy has been presented as a part of a new Management Plan for Cattle Production Conditions. At this stage there is no provision in the Management Plan for any other endemic diseases of cattle and these will need further consideration to determine priorities and strategies for relevant sectors and conditions.

While supporting the general principles of the BJD Framework Document the dairy industry notes that many details required for implementation of a new strategy have not been developed or resolved. In particular, the dairy industry is concerned that considerable work will be required to develop the proposed tools and operational details, such as the funding arrangements and the communication needs and strategy. It would appear that the initial February 2016 target for implementation of the new strategy may be unrealistic and needs to be reviewed given the scale and scope of the proposed changes and the need to prepare tools, programs and communicate with, and educate, farmers on the new regime. ADF and Dairy Australia recommend that consideration be given to transitional arrangements that facilitate the above.

Specific comments on BJD Framework Document

While supporting the general principles and approach of the recast strategy the dairy industry is concerned about some of the specific elements outlined in the BJD Framework Document as follows:

The document recognises that substantial education and communication effort will be required to assist producers and stakeholders with the implementation of the strategy (**Para #13**). Further development will

be required for the communication needs and how they are to be delivered. The dairy industry believe it is premature to resolve that education and communication will all be channelled through Animal Health Australia as proposed in Paragraph 13.

The document suggests that funding will be sought for a range of activities (**Para #14**). The dairy industry notes that for the proposed activities different sectors and/or jurisdictions are likely to have different requirements, priorities and capacities that will need to be accommodated in funding arrangements.

The dairy industry supports the provision of suitable risk assessment and decision support tools (**Para#28**). The existing National Dairy Industry BJD Assurance Score (Dairy Score) will be revised and modified by the dairy industry to provide guidance to dairy farmers about how to improve the assurance status of their cattle and to assist risk communication between vendors and buyers of cattle. The revised Dairy Score will provide dairy producers with a simplified alternative to the Cattle MAP for high-level assurance (low risk) cattle.

Information should be available to all farmers for risk-based trading and in addition to the Dairy Score dairy farmers will require similar decision support tools when proposing to introduce animals from non-dairy producers. Risk profiling tools for other industry sectors will need to account for different risks, husbandry practices and biosecurity measures available to manage infection with *M. paratuberculosis*. These new risk profiling tools will need to have provisions for a full range of assurance/risk including for all strains of *M. paratuberculosis*.

It is proposed that the Cattle Health Statement will be enhanced (**Para#29**). For the dairy industry the Cattle Health Statement may be a suitable vehicle to communicate the Dairy Score however the dairy industry has reservations about the effectiveness and reliability of the Cattle Health Statement for widespread adoption and communication of biosecurity information. Producers in different sectors and regions have different biosecurity requirements when purchasing animals and the proposed cover of a range of health issues with relevant information by Yes/No responses may be unrealistic. The dairy industry have previously recommended declaration of the Dairy Score in the Other Information Item of the National Vendor Declaration.

The dairy industry seeks further clarification of the proposed regulatory support for an animal health declaration (**Para #29**) when the principles of the new approach is for a reduced regulatory burden.

The current JD Cattle MAP is to be reviewed and alternative assurance tools will be developed (**Para #32**). It is proposed that the present JD Cattle MAP requirements will remain in force until an alternative is introduced (**Para #33**). The dairy industry notes that the verification requirements of the JD Cattle MAP are currently 'on hold' pending the outcome of the review of the National BJD Strategy and a decision will be required on whether these are reinstated or disbanded.

The dairy industry accepts that distinctions between infecting strain (B, S or C) are not relevant to the risk associated with presence of *M. paratuberculosis* infection in a herd (**Para #35**), however, the expression of disease may differ with different strains and alternative biosecurity management measures are likely to be applicable.

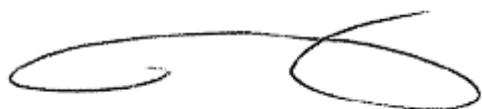
The framework document suggests that trace-forwards and trace-backs by producers will be encouraged (**Para #47**). There is no explanation of what purpose this requirement will serve or how the outcome will be achieved in practice. The dairy industry is concerned that the proposed approach will be unworkable in any practical sense and recommends that this requires further consideration and deliberation.

The framework document recognises that producers may wish to achieve higher levels of quality assurance (**Para #52**) but only refers to additional monitoring of herds. The dairy industry believes that higher levels of quality assurance are achieved by the adoption of appropriate biosecurity measures and that the role of monitoring is a means of verifying these biosecurity practices.

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

We are also keen to assist and contribute to the development of the detailed arrangements for the new approach to manage BJD including the resolution of the issues that have been outlined in this submission.

Yours sincerely

A handwritten signature in black ink, consisting of two large, overlapping loops.

David Losberg
Senior Policy Director
Australian Dairy Farmers Limited

A handwritten signature in black ink, starting with a large 'R' followed by 'Condron'.

Robin Condron
Manager Animal Health and Welfare
Dairy Australia



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18 November 2015

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

To the BJD Review Team,

Re: National BJD Strategic Plan Review – AgForce Response to Framework Paper ‘BJD – Where to from here?’

Overview

AgForce thanks the BJD Review Team for the opportunity to comment on the ‘BJD – Where to from here?’ Framework Document (the Framework) as part of the National BJD Strategic Plan Review (the Review).

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. The strategic vision of AgForce Cattle is for a ‘progressive and profitable beef industry’ for Queensland.

As per our previous contributions to the Review it is necessary to have appropriate systems in place that provides animal health, welfare and biosecurity assurances to our customers both domestically and internationally.

Comments: The Framework

AgForce recognises that a significant amount of consultation has occurred in developing the Framework and provides in principle support to the Fundamental Objectives (P8, pg. 4). Core to our previous submissions to the query was that –

1. Trade risk to domestic and international customers is clearly recognised and managed;
2. Mandatory tools are put in place that support reducing this risk for the trade of cattle;
3. JD retains regulatory control processes in Queensland; and

4. Industry and government are provided with appropriate levels of resourcing to manage this change effectively.

However, in meeting these Fundamental Objectives AgForce is of the view that the following amendments must be made to the Framework and be a consideration in the jurisdictional roll out in Queensland:

AgForce Concern	Key Reference	Comment
1. Trade risk to domestic and international customers is clearly recognised and managed.	P22, pg.8: Industry and trade requirements are the determining references.	No operational tools, either at an international or domestic level are offered to support this overarching 'fundamental.' This needs to be rethought at a trade cooperation level as this is not something that can simply be managed by producers.
2. Mandatory tools are put in place that support reducing this risk for the trade of cattle.	P28, pg.9: Three key types of tools.	This tools must be mandatory in order to provide assurance to producers and participate in the market. A PIC status register should also be considered.
3. JD retains regulatory control processes in Queensland.	P39, pg.11: Regulation will not be mandatory for JD in cattle.	AgForce was supportive of the removal of trace forward quarantine, instances of clinical diagnosis should be managed and reflected in regulation accordingly. Biosecurity Queensland should retain its role as regulator and manager in the instance of a positive diagnosis.
4. Industry and government are provided with appropriate levels of resourcing to manage this change	P14, pg.4: Funding.	It is very unclear the levels of funding to be allocated by industry and government and whether this will support the roll out of market participation tools for producers. Any change

effectively.		to the current conditions will only be supported if sufficient financial support is provided. Clarity is sought around the exact contributions by Animal Health Australia and, in this instance, Biosecurity Queensland.
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Lastly, it must be noted in the instance of the roll out in Queensland this should not be considered in isolation of the broader biosecurity reform and resourcing –

- *Biosecurity Act 2014*: To be fully implemented by July 2016 this Act does shift policy setting responsibility to a more regional and farm focus. However, JD management needs to be considered as part of the broader focus of this and in line with the *Biosecurity Capability Review* (as per below).
- *Lack of Queensland Cattle Industry Biosecurity Fund*: Industry currently has no means of supporting any market participation tool through an industry funded, government collected scheme. This situation needs to be amended moving forward in any changes in biosecurity management.
- *Biosecurity Capability Review*: This is currently an ongoing review into the current biosecurity system in Queensland and the gaps in both government capabilities. No major reform should be pursued until these gaps are known and strategies are put in place to address these.
- *Biosecurity extension services*: There is currently a lack of any extension officers (public sector) delivering biosecurity extension. In the instance government wishes to step back from a traditional manager/ regulator role this will need to be filled with education and awareness services to effectively manage the change period.

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

Dear Review Team

I would like to compliment the panel for the framework you have developed and the process by which this has been done.

It seems the bases are covered to develop management programs for the widely divergent conditions around the country.

There is one issue regarding access to export markets that still causes me concern.

The final discretion remains, properly, with Federal authorities however there have been instances in the past where under the precautionary principle access has been denied on the basis of "no evidence that disease is not present". This is a double negative and is logically absurd and impossible to achieve.

I submit that in a trace forward situation there should be a protocol that clears a property if no evidence of disease is revealed.

Regards

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Submission about the Bovine Johne's Disease Framework, with a Special Emphasis on Australia's Goat Industries - November 2015

Dr Sandra Baxendell PSM, BVSc (Hons), PhD MANZCVSc, GCertAppSC(RurExt), GCertPSectMgt, PGDAppSc, MRurSysMan

My thoughts are this framework would be a very backward step esp. for the goat industry. Goats do not show the severe diarrhoea that is a feature of this disease in cattle. Instead they just suffer from wasting, making Johne's disease easily missed or put down to poor nutrition, worms or other goat diseases that cause wasting, such as CAE or CLA. A recent study of Johne's disease in goats in Saudi Arabia found that the only consistent clinical sign was "weight loss despite apparently normal food intake" in adult goats.ⁱ The visible signs on post-mortem can also easily be missed in goats as was demonstrated in a study in a large US goat herd with a high incidence of Johne's diseaseⁱⁱ where 120 post-mortems were conducted. Johne's disease in goats also occurs in younger animals that is the case with cattle i.e. as early as 12 months.ⁱⁱⁱ Gross post-mortem signs are often difficult to see with the naked eye. A diagnosis would easily be missed unless histology was done.

Key points are:

- Australia has reaped the rewards for past efforts of eradicating diseases such as TB and bovine brucellosis- something countries like NZ and the UK now envy. Australia did this with strong leadership, good education and regulation.
- Other countries are improving their animal health statuses. Japan and Norway are busy with eradication progress. Norway recently eradicated CAE, JD and CLA from their commercial goat herds.
- JD is an animal welfare issue as there is no treatment and vaccination only delays onset, hence prevention is necessary for good animal welfare of all affected species.
- Weakening Australia's Johne's disease controls, weakens the "clean green" image of Australia and its growing reputation for good animal welfare.
- Queensland has a major advantage in having very low incidence of JD, as demonstrated by regular abattoir monitoring of sheep and other surveillance.
- While recognizing that individual producers have suffered financial hardships, these producers can be compensated for the difficulties of being quarantined common good.
- Qld lacks natural barriers (large islands, deserts between agricultural areas etc) that could be used for regional biosecurity plans or prevent spread.
- Climate change will mean more floods and hence soil movements onto properties and therefore the possible spread of Johne's disease onto properties doing the right thing and keeping out JD from other properties upstream not doing anything about their JD.
- Relying on common law will be very expensive for producers to use. Trade practices regulators have been very reluctant to tackle agricultural issues in the past and will also prioritize children's toys over animals.
- This framework does not mention Crohn's disease, despite the long standing suspicions as summarized on this website <http://www.johnes.org/zoonotic/index.html> . There is already a Youtube video from a Crohn's sufferer calling for the ability to buy BJD free animal

products in Australia – see <https://www.youtube.com/watch?v=4CELZLY2X9c> If consumers consider BJD important, they won't wait for scientific proof.

- There is no guarantee that resources removed from the regulation of Johne's disease will be moved to education and adoption of biosecurity. Governments may take the opportunity to get rid of government veterinarians and stock/biosecurity inspectors. Also by not ensuring tracebacks and traceforwards the opportunities will be lost for checking systems and reinforcing the skills of government staff.

My comments on the specific points of the framework are as follows:

9- re the proposed Management Plan for Cattle Production Conditions 2016-21 - goats are often on very small properties and hence have less opportunity for biosecurity buffers than larger commercial properties

11 – I disagree that this new approach should take “the business interest of producers as its cornerstone”- instead improving animal health and welfare should be the cornerstone, along with public health and then business interests.

14 – extension and communication activities have failed before and need the support of regulation to underpin it for those that refuse to do the right thing

23 – common law is very expensive to use and small and hobby goat producers will not have the damages to warrant taking cases to court

31 – goat properties are very scattered and hence less likely to be able to benefit from regional biosecurity plans . Goats uptake of the Market Assurance Program has been very poor and mainly driven by plans to export to Western Australia – currently only 22 are in any stage of the MAP scheme (http://edis.animalhealthaustralia.com.au/public.php?page=mapsearch&aha_program=3)

38- many goats are kept in cities and use small animal veterinarians who may not have the knowledge of Johne's disease required, especially the knowledge about how goats react differently with Johne's disease e.g. no scouring, earlier onset . Also many goat owners ask Facebook groups and other goat owners for goat health advice and are therefore more likely to get very poor advice.

39 – not quarantining in states where this has always happened will spread Johne's disease

41 – while the commercial consequences will vary with the presence of Johne's disease, the animal welfare consequences will be the same i.e. cattle, sheep and goats will have a slow and painful death.

42 – disclosure of Johne's disease needs to be mandatory. Most goat owners will not have the knowledge to ask about Johne's disease and hence if this rule goes ahead, Johne's disease will spread widely in new goat owners

47 – tracebacks and trace forwards needs to be mandatory and not left to the individual owner of the property where Johne's disease has just been identified. Due to the long incubation period, purchasers of animals from a property where Johne's disease has recently been found have a right to know this so they can take steps to prevent spread on their own property. Also these traces are good opportunities for government departments to check their systems and processes for exotic disease outbreaks.

Dr Sandra Baxendell, PSM, BVSc (Hons), PhD MANZCVSc, GCertAppSC(RurExt), GCertPSectMgt, PGDAppSc, MRurSysMan

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ⁱ Tharwat, M., F. Al-Sobayil, M. Hashad and S. Buczinski (2012). "Transabdominal ultrasonographic findings in goats with paratuberculosis." *Can Vet J* **53**(10): 1063-1070.

ⁱⁱ Gezon, H. M., H. D. Bither, H. C. Gibbs, E. J. Acker, L. A. Hanson, J. K. Thompson and R. D. Jorgenson (1988). "Identification and control of paratuberculosis in a large goat herd." *Am J Vet Res* **49**(11): 1817-1823.

ⁱⁱⁱⁱ Jones, P. H. (2003). "Paratuberculosis in goats " *Goat Veterinary Society Journal* **19**: 4-10.

To Mr Duncan Rowland
Animal Health Australia

Dear Sir,

I have read and understand the proposed changes planned in the papers and submissions relating to the BJD National Policy Review.

Our business has formed the view that while streamlining the process of controls for Johnes' disease may be necessary for administration and sound governance, in practical terms from a Western Australian cattle producers' point of view, creating a voluntary mechanism for managing the problem of Johnes' or any other exotic disease which may turn up in the WA cattle herd into the future is a soft approach to good management of the problem at best and downright carelessness in protecting the national herd health status.

I am a Pilbara producer with a herd larger than 5000 head which is significantly bigger than most southern herds. I am dependant on the live export industry and maintaining a high standard of herd health to supply my customers.
Any dilution of national disease standards will be detrimental to our business.

I support the submissions made to your reference group by other WA producers wanting you to maintain the current regulation and enforcement of national standards.

Yours faithfully,

Grant Brooks

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Submitted by: Angus Campbell
Flinders Island
Tasmania

17 November 2015

In June of this year I attended a seminar conducted by Dairy Australia at a property near Longford in Tasmania relating to the agistment of dairy heifers.

This type of operation would appear to be well suited to farmers on Flinders Island given the mild climate. Livestock agents from Roberts limited have also advised that the agistment of dairy heifers could be a viable alternative for farmers on the Island and have indicated a willingness to manage the agistment arrangements.

I understand that the only issue that would prevent the agistment of dairy heifers is the BJD free status of the Island. It is interesting to note that sheep from Flinders Island cannot be shipped from the Island other than direct to an abattoir because of the prevalence of OJD within sheep flocks on the island.

Removal of restrictions on the movement of cattle between Flinders Island and the rest of Tasmania would give farmers on the island the opportunity to diversify their operations and make their farms more viable.

To Animal Health Australia

Submission from AS & M Campbell and Son

Re: BJD – WHERE TO FROM HERE?

We Gaye and Bruce Campbell of AS & M Campbell & Son, 'Cooara' 316 Westcott Road, Keysbrook WA strongly agree with the Proposal Document put forward by joint signatures, WA Farmers Federation, United Beef Breeders Association of WA, Western Australia – Holstein Australia and Country Regional Councils Association of WA (CRCAWA) for a strategic approach to Bovine Johnes Disease in Western Australia.

We have no confidence in our neighbours taking responsibility for safe guarding biosecurity at their farm gate and advocate for retention of the Western Australian States BJD – free status.

Yours sincerely
Gaye and Bruce Campbell



23 November 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 – FRAMEWORK DOCUMENT

Thank you for the opportunity to comment on the draft 'Framework Document' entitled, *BJD – Where to from here? A fresh approach to the management of Johne's disease in cattle.*

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 expects to have an ongoing 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.

SPECIFIC COMMENTS

Broadly speaking, Cattle Council supports the general direction being taken in the document. The Council acknowledges that in most parts of the country Johne's disease is 'just another endemic disease' and, as such, should be managed as part of an overall on-farm biosecurity system.

Having said this, Cattle Council is unwilling to accept that a key component of a strong, national biosecurity system – the Cattle Health Statement – should remain voluntary. It is essential that recipients of cattle (as traded, agisted or the like) be provided with the information necessary for them to manage any disease risk that might be presented; this will not happen sufficiently under a voluntary scheme.

The Council's view is reflected in two resolutions emanating from a telephone meeting of the Board on the evening of 23 November 2015:

That, to maximise awareness and adoption of on-farm biosecurity throughout Australia and guard against unwanted movement of endemic diseases, a Cattle Health Statement MUST accompany all cattle transactions and movements where a change of ownership and/or management occurs.

and

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That Cattle Council support the general direction being taken to the future management of BJD in Australia as described in the framework document entitled, Where to from here? A fresh approach to the management of Johne’s disease in cattle, provided the new program accommodates all cattle transactions and movements being accompanied by a Cattle Health Statement.

While it is the Council’s preference that the use of Cattle Health Statements be a regulated requirement in each jurisdiction, the details of how this policy is to be applied are yet to be resolved.

Important at this stage is for relevant elements of the Framework Document being amended to reflect the above policy; that is, to accommodate the future ‘mandatory requirement of use’ for the Cattle Health Statement. Suggested amendments include:

Reference	Current	Suggested
Paragraph 12, p. 5	“In that respect, the new approach introduces a substantial shift in thinking: it requires no State (or Territory) regulation to manage endemic diseases such as BJD.”	State/Territory regulation to underpin mandatory use of the CHS is preferred; please amend to accommodate this.
Paragraph 25, p. 8	“The tools will be industry-developed and industry-driven, to ensure that they are sensitive to – and reflect – the requirements of specific industries and markets.”	Perhaps expand to cover the possibility of ‘co-regulation’ such that the CHS, while “industry-developed and industry-driven”, would preferably involve regulation governing their use.
Paragraph 42, p. 15	“Disclosure of JD status is recommended but not mandatory unless the purchaser requests the information.”	Please amend to accommodate mandatory declaration, via the CHS, of disease (not just JD) status.
Paragraph 43, p. 15	“...disclosure by the seller will be driven by requests for information on the cattle/property’s JD history.”	Please amend to accommodate mandatory declaration, via the CHS, of disease (not just JD) status.

Pursuit of a mandatory Cattle Health Statement should, in Cattle Council’s view, attract jurisdictional support because of the profoundly positive impact it will have on biosecurity awareness across Australia and its consistency with industry’s requirements under the Emergency Animal Disease Response Agreement, particularly s.14, *Biosecurity*. Relevant excerpts from this section follow:

- c) *Animal Health Australia has developed, and will further develop and continue to manage, a national disease risk mitigation program that includes consultative mechanisms to facilitate governments and livestock Industry Parties working together to develop and agree all aspects of the program including:*
 - (i) *Industry biosecurity plans that will describe how each Industry will promote improvements to existing biosecurity measures used within that Industry;*
 - (iii) *application of legislative support where appropriate; and*
 - (iv) *a national communications program that will raise community awareness of the importance of biosecurity measures.*



While these are written within a document focused on emergency animal disease incursions, it is clear that endemic-disease management can play a vital role in preparing the industry for such incursions. The Council will therefore be pursuing this initiative through relevant channels aside from the current BJD Review.

Finally, Cattle Council looks forward to participating in discussions around the finer details of the proposed new management program, particularly in the design of the 'tools' necessary for industry participants to take on the greater level of management responsibility expected of them.

Yours sincerely

Mr Jed Matz
Chief Executive Officer

To: BJD REVIEW TEAM AT ANIMAL HEALTH AUSTRALIA

Re: SUBMISSION IN RELATION TO BJD - WHERE TO FROM HERE

From: JACQUELINE AND ROBERT CURLEY - ON BEHALF OF
GIPSY PLAINS CATTLE CO
P.O.BOX 80
CLONCURRY, QLD, 4824

1 The Management Plan now appears to be heading in a commercially orientated direction summarised in the introduction because of changing practice, reduced funding and biosecurity considerations. This finally makes economic sense for the stakeholders most directly involved and challenged by the current legislation – the beef producers.

2 It appears that BJD will become an endemic listed disease. This needs to be uniform across all Australian states to be completely effective for domestic trading. What primary objective of all state industry bodies representing their producer's best interests will achieve this?

8 A fundamental objective of the management strategy for JD in cattle, states that it wishes to manage and reduce the impact of clinical Johne's disease. And provide tools to allow individual producers to manage the spread of BJD.

From this we ascertain that infected PIC nos will be listed as BJD positive, and governmental departmental staff support only will be available.

If the objective of reducing the impact of BJD is to be reached, there is still a definite need for a biosecurity fund with access available to producers in voluntary management plans. These funds should be used for the actual testing procedures to identify BJD animals within a herd known to have positive animals within the PIC.

The AHA Levies money originally in place, which was capped to \$10,000 per producer prior to the Qld outbreak could be revisited and reworked with priority to fund voluntary testing procedures for BJD and possibly other endemic diseases on the OIE list.

The industry has asked for a lifting of quarantine restrictions, which appears to have been traded for compensation money to producers. I would suggest that under this trade off the compensation downgrade apply to the commercial application of sale of livestock only, but funding remain for voluntary JD testing as well as the continuing employment of appropriate agents to oversee the testing programs.

There will no doubt be some form of monitoring to enable cattle health declarations of low risk, eg abattoir tests which will inevitably unearth positive infections. These PIC nos are more likely to address the issue of voluntarily managing and reducing the impact of JD within the beef industry, which with the

combination of all the JD strains may become more prevalent. This applies from paragraph 44 to 47 in particular where tracing will be strongly encouraged.

As has been noted on many occasions JD is not a significant economic threat to producers, hence the only real commercial threat was via quarantine. However as health certificates are to be issued for export, and JD is still listed by the OIE as an identifiable disease it will be beneficial to have a funding avenue for the industry to voluntarily contain the disease. This then meets the objective of managing and reducing the impact of clinical Johne's disease and maintaining the viability of the affected producer while JD remains on the OIE list.

18 Elimination of the Zone concept is a step forward for the domestic beef industry.

21. Freedom to trade is a most important objective that has been realised. Commercial sense has prevailed.

25 There needs to be an easily accessible route to the full history of an animal. Currently this can only be obtained via DAFF. Recently I instigated a search for animal histories and it is very time consuming process necessitating permission of previous owners to access this NLIS database information.

28 and 29 Keep all of the tools simple and cost effective. The beef industry is financially and usually staff and work time challenged. They need tools to enhance their business top line – not take more off the bottom line by regulation and possibly more work to back up the paperwork at the end of the day.

Thank you for the opportunity to comment on this BJD review. Could you please advise receipt of this letter.

Robert and Jacqueline Curley

Gipsy Plains Cattle Co
Directors

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Ph: 0747425956

We are unable to personally sign this letter as our scanner and printer ceased to work today.

Some thoughts on the document for which review comments were requested.

Generally appears a reasonable approach as would agree the zones are not a practical risk control tool for producers.

Having seen the impact on another producer with having a positive BJD case with an introduced animal - In relation to the implementation:

As the quarantine status and compensation of the current state is removed there should be clarity as to whether notification of BJD status of a PIC is held confidentially by the government. As if this information is public it could have a significant commercial impact for a stud producer and reputational damage. If disclosure is voluntary - though required if requested, then the status of an individual property/PIC should be kept confidential from public records. Regionally there should be notification as to whether disease is detected in increasing regional awareness and putting the onus on purchasers to request declarations and potentially long term increasing the perceived value of a tested and confirmed free herd.

However as a disease management tool and general mechanism to improve the Australian cattle herd there should be a mechanism for producers to sell cattle through the yards for slaughter as 'non suitable breeding stock' to ensure a commercial route to disposal of clinically impacted but symptomless animals to incentivise detection and elimination of the disease without a disincentive of reputational damage of producers who do test and improve the disease status and bio security of their herds. This is also a route for disposal of animals who are barren, injured and are structurally unsound to give them a direct route to disposal. A tax incentive/offset for animals disposed this way may increase incentive for producers increase biosecurity and then go through their herds and eliminate any disease, physical or genetic conditions which are non desirable in the Australian national herd.

A mechanism to incentivise testing over a 5-10 year introduction of the PIC based scheme would be suggested, as well as a pathway to then validate an infected property is disease free via a testing and/or destocking strategy to regain accreditation. Eg recording clear as well as infected. Any property validated as clear (eg after destocking or via testing via cattleMAP over a sufficient period) should be recognised as such otherwise property values could be impacted by a previous positive reading that is now resolved many years late.

The requirement to declare a property as known free of a disease on sale rather than individual animals should also be considered - though the impact of feral animals such as deer and goats on BJD and the impact on property accreditation is also something I would want advice on as a producer. Eg biosecurity measures to reaccredit a disease positive PIC might need to involve double barrier feral animal fencing and culling of feral animals known to be able to transmit the disease? Or would just destocking sheep, cattle and goats for a 2 year period be sufficient? Or testing/culling animals over a 2-3 year period.

It would be good if National and State grants were considered for upgrading of property bio security arrangements to support compliance with this approach.

Kind regards

J Dawson

joannadawson@macace.net

Michael De Long
Dampier Downs Station
PO Box 8110
Broome WA 6725
(08) 9191 7069

16th November 2015

As a pastoralist from the Kimberley region of Western Australia, I welcome the opportunity to comment on the report “BJD – where to from here”.

Deregulation of the Johne's disease (JD) is the only practical solution and a win for common sense. As such, I strongly support the move to deregulate JD and treat it in the same manner as any other endemic disease.

The present strategy incurs severe financial hardship based on mere suspicion the disease is present in a herd, to the point it has destroyed businesses, families and lives. In addition, current available tests are notoriously unreliable, expensive and time-consuming to conduct.

I believe there is a real possibility that vested interests within Western Australia will lobby for the state to maintain its BJD-free status. If so, this must be based on robust science, which the current level of testing does not support. As such, I strongly feel that should Western Australia decide to impose continued regulation for JD, then all costs for monitoring and testing should be borne by the State.

Maintaining the current system for managing JD will have crippling economic implications for northern beef businesses. These cost will have effect in the short term, particularly if the cost for monitoring are passed on to individual businesses, but will also have severe long term consequences. One obvious cost to the industry will be the loss of superior genetics being brought into the industry. If the government is serious about developing the economy of northern Australia then deregulating JD is the only logical outcome.

Biosecurity Tasmania is largely supportive of the Framework proposed in the document "BJD- Where too from here".

My only concern rests with the definition of BJD. As previously discussed with you I believe that framework should be focused on clinical disease and not presence of the organism. As such I consider BJD should be defined as clinical disease with confirmation of *M. paratuberculosis*. Detection of *M. paratuberculosis* in the absence of clinical disease should not be regarded as BJD. It is however reasonable for a prospective buyer to ask about testing for *M. paratuberculosis* if they consider this appropriate.

I have attached a suggested edit for paragraphs 34 and 35 on page 11.

If the definition is retained to include "Infection with *M. paratuberculosis* is confirmed in an animal that may not be showing clinical signs." Then I think that "Distinctions between the infecting strain ('B', 'S' or 'C') are not relevant to the determination of the presence of JD" should only apply if there is evidence of clinical disease in the herd. That is strain type is not considered if there is clinical disease, but strain type should be considered with detection by lab testing where there is no evidence of clinical disease in the animal or herd.

regards

Rod Andrewartha
Chief Veterinary Officer
BIOSECURITY TASMANIA
Phone **03 6165 3261**
Fax 03 6278 1875
Rod.Andrewartha@dpiw.tas.gov.au

As presented on AHA web site

Presence of JD

34 The presence of JD in a herd means that:

A clinical case of the disease is identified and/or confirmed by definitive testing; OR
Infection with *M. paratuberculosis* is confirmed in an animal that may not be showing clinical signs.

Strain of JD not relevant

35 Distinctions between the infecting strain ('B', 'S' or 'C') are not relevant to the determination of the presence of JD.

Suggested Edits

Presence of JD

34 The presence of JD (Clinical disease) in a herd means that:

A clinical case of the disease is identified and/or confirmed by definitive testing

Distinctions between the infecting strain ('B', 'S' or 'C') are not relevant to the determination of the presence of JD where clinical disease is present.

Reporting of JD is to be based on this definition.

35 Infection with *M. paratuberculosis*

~~;-OR~~

Infection with *M. paratuberculosis* is confirmed in an animal that may not be showing clinical signs.

~~Strain of JD not relevant 35 Distinctions between the infecting strain ('B', 'S' or 'C') are not relevant to the determination of the presence of JD.~~

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Barlyne Pastoral
PO BOX 190
Gayndah
QLD 4625

To whom it may concern,

Our overall perception of the review is positive, as long as there is consistency across Australia. However, if this passes and the industry no longer receives the adequate assistance it needs, the advantages and potential future advantages of having a low incidence of BJD in Queensland, South Australia, Western Australia and Northern Territory will be lost.

Even though the prevalence of the disease does not warrant the government to intervene in the southern states, the advantages of preventing the influx of potentially diseased cattle to areas where a combination of luck, environment and management has limited the impact of BJD, far outweighs the cost of prevention. This can only happen if a regulation is generated from Animal Health Australia to make it mandatory for vendors from endemic areas or where the disease has been diagnosed to declare their animals. Cattle going into registered feedlots and straight to slaughter should be acceptable, however, it will be devastating for them to go into breeding areas.

As the proposal stands (section 42 & 43) vendors are not enforced to declare evidence of BJD in their herd, whereby encouraging unethical behaviour. Unsuspecting buyers who purchase infected cattle can potentially pass on the disease to neighbours and surrounding areas without knowledge. When a properties biosecurity is compromised, farming families lose their identity, integrity, target market and ultimately their livelihood.

Yours sincerely,

Jim Edwards, on behalf of the Queensland vendors of the Fitzroy Crossing bull sale.

Hi,

A quick email to show our support in keeping WA's BJD FREE STATUS.

I believe BJD needs to remain a notifiable disease. Taking away the free status of WA will have no benefit for WA but more an economic benefit for other states and taking away the hard work provided by the WA Agricultural department to keep our state clean. The removal of WA BJD FREE STATUS will have a direct effect on the entire WA Cattle Industry and could be catastrophic for seed stock producers, exporters and the domestic industry.

Regards

Fairbrass Park

Mat Fairbrass & Aimee Court

PO Box 1036

Busselton, WA, 6280

(08) 9755 9038

Dear Review team,

Let me begin by stating that the following comments are of personal belief as a veterinarian and beef producer.

As a whole, the released JD Review is a great step forward in what has been an unsuitable policy to date. Should it be implemented, bonds between clients and veterinarians should see improvement as we step away from current imposed quarantines without clear direction forward.

I do, however, question the practicality of placing a mark against ones PIC without the evidence of ongoing prevalence on farm despite any control measures which may have been undertaken minimise further spread or introduction. Does sitting on ones hands for 5 years truly remove known presence more than a conscious effort to take control and if so, should this not be accounted for? Without incentives to manage a disease of varying economic impact, we with neither know more accurate prevalence or prudent control measures.

Should the quarantining of listed notifiable disease be lifted, I urge a more active monitoring system for Johnes' disease. Whilst I would anticipate an increased presence of disease will become apparent with a more directed testing cohort, at least practical control and management practices can be reviewed as required and implemented as needed.

Education of all PIC holders is paramount, however as mentioned earlier, without incentives, be it financial or PIC status based, limited uptake of sound biosecurity measures will be seen. I would urge that considerable funds are allocated to such activities, including relevant AVA members to assist with the process.

Kind Regards,

Neil

Neil Farmer BVSc
Farmer's Veterinary Service.
Farmer & Co. Pty Ltd
'Lake Learmonth'
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Hi Everyone,

Thanks for forwarding a copy of the report. I appreciate that a lot of work has been put into it, although as far as I know, everyone on the Review Committee was on the payroll so whilst I appreciate your efforts, you were only doing a job that should have been carried out years ago.

In the meantime many farmers have suffered substantial financial and mental pressure because people who could have helped refused to do so for reasons known only to themselves.

However it is never too late to act and many of the decisions which hopefully are about to be made, will be large steps in the right direction but there appears to be a certain amount of each way betting going on. You can't steal second base with one foot on first. Please deregulate JD and let market forces decide and as I said at the Melbourne Meeting publically to Duncan Rowland: 'I believe he can go down in History as the man who helped make a significant decision for the good of Australian Cattle industry'.

Anyway thanks for your efforts now let's make it happen.

Kind regards,

LAWRIE FLANAGAN

lpflanagan@westnet.com.au

Lawrie 0418 570 773

Nick 0407 689 126

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

Dear Mr Rowland

**CHANGES TO MANAGEMENT PRACTICES FOR BJD INTO THE FUTURE –
FRAMEWORK DOCUMENT FOR PUBLIC CONSULTATION**

After consultation with the Gascoyne Development Commissions' Board, I am writing in support of the current policies in controlling the disease at state level, as opposed to the recommendation of the Framework Document to focus management at the producer level.

The Gascoyne Development Commission Board therefore support the retention of Western Australia's status as "BJD Free".

Yours sincerely



Geoff Strickland
A/Chief Executive Officer

18 November 2015

RESPONSE TO BJD FRAMEWORK DOCUMENT BY JOHN GUNTHORPE, BJD ACTION COALITION

21 Cavell Avenue
ASHGROVE QLD 4060
0400 403 456

10th November 2015

Point 5 - Developing the new approach: Background

The spread of Bovine Johnes' Disease is unknown. Testing is so inaccurate and so rare that it would be impossible for the Australian Beef Industry to know the level of infection in the national herd or any geographic segments of the herd. It may be endemic in the dairy herd in various locations but again this is unknown.

Point 6 – The need for a different approach

The “groundswell” was due to the pain and suffering being inflicted on a few for the supposed greater good of the industry. The evidence was so clear and irrefutable that it is now an indictment on those that continued to prosecute the policy that they were engaged in activities that could be best described as misguided or at worst illegal.

The consultative process was a sham led by MLA and CCA that cost levy payers significantly and was drawn out to delay the change that was called for some two years earlier. In the end the review has given us the same outcome as was delivered to the sheep producers in 2013. Deregulation is deregulation no matter how it is framed or how long it takes to arrive at this outcome.

Point 7 – Developing the new approach: Participation

It is a disgrace that so many organisations funded by levy and tax payers had to be involved in solving a problem that costs northern Australia only \$300,000 a year. In the south it is only costing \$2.5 million and this is primarily in the dairy herd. It is the least significant production-cost disease in our industry.

Point 8 - Fundamental Objectives

Amen. Thank God you have dropped the use of the word “control”.

Point 9 – Principles of Strategy

With regard to the dot points mentioned –

- Agree
- Agree

- There should be no requirement for dual fencing to provide a buffer. This is an extraordinary cost for a cattle producer and unless the industry is prepared to fund the cost then the benefits are so low as to make the exercise prohibitive.
- Good now that MLA has acknowledged the insignificant economic importance of BJD there is no need to improve management of BJD. We should concentrate on those 16 diseases that are ahead of BJD on the economically significant list and stop trying to reduce its prevalence.
- Agree
- Difficult to know if we are talking about BJD or all diseases. Test results are so inaccurate in BJD and the reward from improved testing so low that no further funds should be spent on developing a BJD test. Our industry can spend their limited funds in more productive areas.
- Agree but it should be national not state.
- Agree. This is a motherhood statement.
- Fully agree.

Point 10 – Biosecurity as a wider reference

Agree.

Point 11 – Primary focus of the new approach

Agree - where they should have been all along!!

Point 12 – The new approach reflects a shift in thinking

It does not involve a shift in thinking. It involves the admission of error and recognition of the damage caused to the innocent producers caught up in the prosecution of the current policy by the zealots in the CCA, AgForce and State Departments. Minority interests with a vested interest in preventing competition in the seedstock industry have utilised the scare tactics of CCA and others to stop genetically superior products entering their market through the adoption of the current BJD strategic plan. State organisations affiliated with CCA allowed their members to do this treachery and required compliance of CCA in this process. CCA often hid behind their state affiliates with the words: "It is what our members ask of us." Many are culpable in these acts and often by the act of omission. How a government can walk away from a promise of full compensation is unbelievable. Industry must now pay into a Biosecurity Fund to compensate those damaged by the errors encapsulated in the current policy.

Point 13 – Extensive education and communication effort

AHA is not the appropriate organisation to provide the education and communication. MLA are well resourced in this field and already visit beef and dairy production areas providing education on all matters relating to improving production and managing costs. Biosecurity is just another tool for improving producer efficiency and MLA should be the channel for providing communication and education on this topic.

Point 14 – Funding

There seems to be a blending of the work necessary for management of BJD with an overall management plan of all endemic diseases. This is not helpful in the development of the new BJD strategic plan. For example there is no requirement for ongoing research into BJD to help producers minimise the impact of BJD on their business. BJD is the least significant disease faced by producers. In northern Australia it only costs \$300,000 per annum. There is no need for “an effective system for monitoring individual herd endemic disease management programs” for BJD. There may well be for others but BJD is so inconsequential that this work is wasted.

In fact there is little need for funding for BJD. Industry and taxpayers have already footed the bill of the past costs of the current national BJD management plan and these would now exceed \$100 million. Enough is enough. Stop spending money on BJD and look for other diseases and risk areas to spend the levy payers’ limited funds.

Point 15 – New approach will replace existing SDR&Gs

Hallelujah brethren. We can see the Promised Land.

Point 16 – Current SDR&Gs apply until formally set aside

Pull out all stops AHC to set aside the current SDR&Gs. They are an anathema to cattle producers and their adoption caused severe stress and hurt to our industry. They must not exist a minute longer than absolutely necessary.

Point 17 – The property is at the heart of the new approach

Agree - as it is for live export and all other management interest including abattoirs.

Point 18 – The concepts of zones and surveillance will be set aside

Agree – there was no evidence to support the claims.

Point 19 – The property as the true focus of risk and opportunity management

Agree.

Point 20 – Shared status between neighbouring properties does not constitute a zone or area

Management must always be at the property. This proposal could be the thin edge of the wedge for the redevelopment of zones or areas. The disease is so difficult to test for and so slow moving that it would be dangerous for there to be shared status. I am opposed to this proposal.

Point 21 – Freedom to trade

Agree. Again we should not merge the needs for management of other endemic diseases with BJD.

Point 22 – Industry and trade requirements are the determining reference

Agree.

Point 23 – Risk and opportunity management in the hands of the producers

Again this is a motherhood statement reflecting the everyday operating decisions of the producers. By the way these decisions are dynamic and will change with the seasons / market.

Point 24 – Informed decision-making and risk management

There is a word “discipline” that needs to be included when speaking of managing risk. Otherwise agree.

Point 25 – A variety of risk management and decision-support tools

This again seems to move beyond the requirements for the management of BJD. Yes they are all well intended for the management of more significant diseases but NOT BJD.

Point 26 – Forming views on key considerations

Do not overcomplicate the process. I do not agree that this level of effort is necessary to manage BJD. The disease is insignificant and most producers will continue to sell and purchase cattle without reference to the disease. This is appropriate and responsible. You can set up the system for those that need it but it cannot be compulsory and to my mind will not be utilised by most beef producers.

Point 27 – Reduction of risk and informed decision-making

It will be more important to use the tools for diseases other than BJD. BJD will be the least significant disease for the application of the tools.

Point 28 – Three key types of tools

Tools should first assist the producer to reduce their risk on farm by managing cattle on arrival at the property etc. There will be no test history for more than 99% of beef cattle properties. These tools may be appropriate for dairy herds in which case they should be described as such. Beef producers will say they have no known BJD on property. You again appear to be developing a process for those more significant diseases but NOT BJD.

Point 29 – Upgrade Cattle Health Statements

We elect governments who get rid of bureaucratic red tape. There is no need for this over kill as far as BJD is concerned. Agents will resist such a move as it will push more producers to sell direct to abattoirs and not through saleyards. Abattoirs will not need a Cattle Health Statement and frankly if you do for live export then you are admitting the current system is inadequate – which it is not as far

as BJD is concerned. There is no need for regulatory support as far as BJD is concerned. It is a notifiable disease and that should be sufficient. Testing is inconclusive and the producer will kill a suspect animal rather than subject himself to testing. This is reality. Do not involve a government department for the least significant disease our industry is asked to manage. This may be appropriate for other diseases but NOT BJD. Because of the lack of certainty on testing of BJD and the fact it cannot be detected in animals less than 2 years of age consumer law has no place in the management of BJD.

Point 30 – Freedom to design and use other tools

Again this use of socialism to spread the management of BJD is unhelpful. I can see the situation where northern WA producers will say they do not have BJD and will join together to prevent cattle coming from other regions of Australia entering their region without check testing and we will be back where we are now. BJD does not warrant this form of protectionism and movement restrictions should not be allowed into regions or areas. This will only be practised to promote self-interest and stop competition. It would have some ACCC issues as do some of the current practices. BJD has been a tool for these producers to stop competition and isolate their region from competition in the sale of superior genetics. It must not be in future and so should be removed from the new plan.

Point 31 – Property and regional biosecurity plans (“RBPs”)

These plans have no place in the management of BJD. They may in other diseases but NOT BJD. Again I can see RBPs being used to prosper self-interest to the detriment of the industry. They should not be used to limit access to the region on which they are focused. This decision must be left to each producer in the region. You will be replacing zones with regions unless this position is made totally clear to all involved.

Point 32 – Improved risk assessment instrument will replace the current CattleMAP

NO - MAP has been a failure for our industry and its immediate cessation is required. Why members are still testing to be in MAP beggars belief. I understand the numbers are well down and so they should be. In MAP seedstock producers are playing Russian roulette and when they get a “suspect” they are bugged. Even in a reasonable state like Victoria they are quarantined and unlikely to emerge as time will destroy their ability to earn an income and their reputation will be damaged as most commercial producers do not understand BJD. This is happening today even though we are in the death throes of the current SDR&Gs.

CattleMAP is a scourge on our industry and has been to the detriment of those who are members. I refer to the submission of Rod Hoare to this review in which he states: “The reality is that we have not sold any animals as a direct result of being in the BJD MAP”. Others joined because they wanted to do the right thing and improve the confidence of their buyers that were keeping pace with improved biosecurity. Nothing could be further from the truth. MAP must be stopped now and seedstock producers advised on the errors made by those who designed the system.

There has been no reduction in the spread of the disease from those adopting MAP and there can be no confidence that BJD is not being carried by any of bulls sold less than 2 years of age. We know the disease can lie dormant in the animal for its life and only move into the gut when conditions change and the animal is placed under stress. Only then will it shed the disease and then intermittently. So MAP was never going to work and to hang onto its vestiges is pouring more fuel to the fire. STOP MAP NOW. No vendor of bulls can be confident about the status of their animal if less than 2 years of age. Most bulls are sold in this time frame. Stop duping the bull buyers and suggesting the bull is from a herd free of BJD. If they wish they can say it in their advertising blurb but they cannot be confident of the statement.

Point 33 – Current MAP requirements will apply until CattleMAP is formally set aside

There is a rider we should add: “or until such time as all those who are members of MAP leave and stop testing.” This would be our advice to those who persist with MAP. My recommendation would be to cease MAP now and stop any future requirements of zones or regions to require its use. If this means no sales into these zones or regions until the new management plan is adopted then so be it.

Point 34 – Presence of JD

I assume the testing of an animal not showing clinical signs of JD would be post-mortem. There are plenty of properties where animals have been destroyed and vets attend without reporting the disease. These vets are acting in the best interest of their clients and in the best interest of the disease management. They understand the disease and its insignificant nature. They also know the barbaric consequences of a notification under the current SDR&Gs. Doctors assist dying and vets ignore BJD. **We must spend efforts to have OIE remove JD from the list of notifiable diseases.** This should be a statement in our new management plans.

Point 35 – Strain of JD not relevant

Agree. This is totally different to the current SDR&Gs which were blatantly wrong and led to very poor decision making with regard to the past management of BJD.

Point 36 – Tests and testing for JD

Tests are 20% reliable. It is the nature of the disease that causes this result and it will always be so. Let us decide to stop the false positives by stopping the testing. When the OIE remove the disease from the list of notifiable diseases as surely they must, there will be no requirement for testing and the disease will slip into the status it deserves. We will know it is there but there is no economic reason to do anything about it. This is where most other countries have arrived at. It is just our industry has spent many millions of dollars and increased the cost of our beef production thus reducing our ability to compete for beef sales internationally. This must not happen again. That it has in the past and they are the same culprits as argued for continued support of the “management control” when scientific evidence disputed this position is cause for concern. **Please do not ask levy payers to contribute to any more development of tests for BJD and this includes from MLA – the major funder with CCA of past test development.**

Point 37 – Understanding the nature and limitations of tests and testing

Disagree. There should be no further testing. As the economic consequence of BJD is better understood by industry members, the call for testing will fall away. This should be recognised now and tests stopped - very little can be inferred from their use to the extent that they should be stopped now.

Point 38 – Interpreting and understanding the results of JD tests and testing

Too many good vets have been forced to advise clients to ignore the disease and slaughter their infected stock without testing due to the past consequences of being “suspect BJD”. This need to take the disease underground will only be lifted when the OIE removes JD from the list of notifiable diseases. Again the economic cost of BJD is so insignificant that tests and testing are not needed.

Point 39 – Regulation will not be mandatory for JD in cattle

Agree and it should have always been so.

Point 40 – Quarantine-related compensation will not apply for JD in cattle

Of course if this statement is true, then it is also true that quarantine-related compensation will apply under the current JD in cattle. FAIR COMPENSATION MUST BE PAID TO THOSE ON WHOM QUARANTINE NOTICES RESULTED IN ECONOMIC LOSS TO THIER BUSINESS.

Point 41 – Commercial impact of JD manifesting on a property will vary

Disagree. Only a property with a known clinical case of JD will be impacted and if the true cost of JD was properly explained to cattle purchasers then there would be no concern. The mystery and fear-campaign surrounding past efforts by AgForce and Cattle Council have created an expectation that JD will result in economic disaster if it reaches our property. This is just not the case and it is impossible to say where the disease is and who cares anyway. Put out a strong statement that JD will have no economic consequence on your herd if it becomes infected and the disease will fall from prominence.

Point 42 – Continuance of trade for a JD affected property

This is a truism. This will be all properties when the truth about JD is published.

Point 43 – Producer driven JD History disclosure

Agree – with one qualification. Very little information is disclosed about disease history in saleyards today. Unless the animal being sold is known to have a clinical case of BJD there can be no problem for the vendor with regard to Trade Practices legislation. This should be clearly stated in this paragraph.

Point 44 – Pathways and plans to reduce the risk of JD incidence on an affected property

Agree but not needed.

Point 45 – Use of JD risk-reducing pathways and plans is voluntary

Agree but not needed.

Point 46 – JD risk-reducing pathways to be species and industry specific

Agree but not needed.

Point 47 – Trace-forward and trace-back

Disagree. The economic cost of JD is so low as to make tracing unnecessary and ill-advised.

Point 48 – Notifiability of JD in cattle

Australia voted for the removal of JD from the OIE list and we should recommend that they continue to support its removal. This should be stated in this paragraph. It should also be stated that as JD is endemic in many countries and regions including the USA and the EC a ban on products from countries with JD is highly unlikely as the World Trade Organisation agreement on non-tariff barriers restricts the use of a disease as a barrier if it is also present in the importing country. OIE also requires that there are reliable tests for a disease for it to be included on the OIE list of notifiable diseases.

Point 49 – JD notification records

Agree until JD is removed from the OIE list.

Point 50 – Life of JD notification records

Agree but there seems to be an inconsistency. Point 48 above states “but an investigation may be undertaken”. Is this an “action” or not?

Point 51 – Defining surveillance

Seems a reasonable definition but why do we need it. It is unnecessary to waste any further funds on any surveillance.

Point 52 – In pursuit of quality assurance

If a proper education program explains to the industry the truth about JD no producer will need to or want to undertake additional monitoring of their herds. **Stop developing this assurance documentation pending a program to explain the truth about JD.**

Dear Duncan,

I think the review has listened to the grass roots producers and I think your proposed new policy will be well received.

Your recommendations include nearly all the BJD Action Coalition policies on BJD management.

We have always said we can't continue with quarantines, trace forwards, confusion around strains, inconsistent application of the law, and stand over tactics. We have always said it should be managed on farm.

This new policy will be more inclusive and less destructive to affected producers but at the same time more effective in the control of BJD. The disease will no longer be pushed underground.

Lack of compensation to affected producers is still a big issue for us but we realise that will be a state issue and hope that AgForce can support us in that after being the main driver behind the current failed policy.

I commend the Review team for being open minded and progressive.

Sincerely,
Wallace Gunthorpe

Dear Review team

I wish to make the following representations on my personal beliefs and experience in animal disease control over thirty years in Queensland government.

I think in general this is an advance in animal health shared responsibility in line with what Australia can currently afford from jurisdictional pockets. History will determine if industry can afford the costs associated with this shifting of responsibility and costs. It would be good to see a commitment to a continuing review program or committee rather than wait to see what happens. Do the review team have any performance markers that would demonstrate success of the transition? It would be worth developing some benchmarks for appraisal of the new system well in advance of a visible failure.

AVA has a critical role in alerting and encouraging veterinarians to developing stronger relationships with food animal clients and in the case of Queensland with animal owning clients in general. It would be encouraging to see inclusion of the AVA in the roll out of the change proposal as well as in monitoring the progress of the progress on management of the disease.

Many of my comments refer to Qld as the impact of the Biosecurity Act will be regulated before 1 July 2016 and it seems to mimic the framework of the Johnes' review closely. We are now aware that all endemic diseases of animals in Qld will not be regulated by quarantine including Hendra virus, cattle ticks and Johnes' disease in any species.

A significant part of the document is paragraph 14 where funding is discussed. The first dot point is particularly applicable to the AVA members and all veterinarians;

"Extension and communication activities that will provide producers with information about biosecurity and the management of endemic diseases of which JD in cattle is just one. This needs to be focused on adoption rather than simply raising awareness"

I would urge the review team to seek inclusion of AVA members in funded activities to ensure adoption of biosecurity for JD in all species. Also funding for vets to get up to speed on risk management and management issues for JD will improve the adoption and compliance with the proposal to remove regulation from tools required to control or limit spread of this disease.

I express concern in regard to paragraphs 49 and 50. While notification is necessary (48) however in the event of no quarantines there is no incentive for official notification and a powerful lot of disincentive for notification as once known as a positive the PIC will be forever tarnished. This has to be changed to allow producers the ability to deal in different risk categories of stock without a permanent blemish on their PIC.

The official line in the development of the new framework is that the disease is not highly infectious and usually enters the farm on the back of a truck with purchased cattle. This is not compatible with a permanent PIC classification which will affect trade for up to five years when the offending cattle may well have been moved or slaughtered without residual infection of other stock.

There is no exit strategy for producers to manage the risk to breeding stock from trade cattle described in the document and most importantly no ability to describe small lots of trade cattle separately to the PIC so once known any future cattle associated with a PIC related to those cattle will be downgraded.

I hope much of this will be accommodated in the cattle health statement, it is apparently not able to be viewed at this time complicating any favourable comment on the platform as the detail is silent or not yet developed. Whatever the reason these details are omitted from the document it is hard to see official PIC changes in notification being accepted by jurisdictions without reference in the framework document.

With little incentive to report or manage or control infection, the disease will spread silently until it is everywhere and not notified anywhere leading to trade mistrust and failure. This is a major flaw in the proposal of keeping official notifiability at PIC level. NLIS could handle notifiability of mob descriptions and tracking mobs in preference to the blunt instrument of PIC notifications.

Finally apart from footnotes no information is given on the status of vaccination. The framework should describe the intended purpose of vaccines and the likely disposition of vaccinated animals.

I do not agree with industry that any reference to Crohnes is removed from the review. There needs to be acknowledgement that Australia recognises the risk and has a risk monitoring and management strategy clearly enunciated for the safety of the public.

I strongly urge a program of monitoring be implemented to assure trading partners, producers and the public that the risk of this disease can and will be managed by the proposed framework.

Robert

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My comments are based on my broad and practical experience:

- My background in veterinary science with field, laboratory and research work
- Past President of Australian Association of Cattle Veterinarians
- Our herd becoming classed as suspect for BJD after purchase of animals from a MN3 herd
- Our herd currently MN3 in the Cattle MAP
- National Biosecurity Farmer of the Year 2012.

I welcome the search for a new approach because it is desperately needed. However, given the scant significance placed on BJD by the OIE I feel that all this effort to reviewing our BJD policy could have been better directed to pressuring OIE to drop JD off the listed diseases. This would have solved the entire problem. Let us be honest – BJD is not a major disease problem. In beef herds the significance of diseased animals is miniscule. Even with the proposed changes the cost of detection is significantly greater than the direct impost of the disease.

I have been waiting for the final outcome of the Review before deciding what to do about our membership of the JD MAP. I support the highest levels of Biosecurity and being in MAP indicates our commitment to disease control. The reality is that we have not sold any animals as a direct result of being in the BJD MAP.

My major objection to the latest draft of the BJD Review is the proposal that all MPTB infections in cattle (whether cattle, sheep or bison strains) will be classed as BJD. This ignores the epidemiological importance of finding the source of infection. The limited data on strain typing in our area suggests that we are much more likely to become infected with the S strain than the C strain. My biosecurity procedures will almost certainly prevent entry and infection with the cattle strain. However, we are surrounded by sheep properties with a high prevalence of OJD. I can keep their sheep out but we have 2 creeks and a number of drainage lines running from sheep farms through our property. We have no control over what the disease status is of neighbouring farms, nor of their management / vaccination policy or of rainfall events which could wash the organism through our double fenced boundaries. If we pick up a positive animal did it come from an infected cow or did it come from the heavily infected OJD properties that surround us?

There is a huge difference in the significance of detection of C or S strains in a herd such as ours. This should be immediately apparent to those considering the change in policy. There is little evidence that the S strain spreads in cattle the way the C strain does. We would need to know the source of infection before we could do anything to control or eradicate it. We are not prepared to continue in the Cattle MAP if this ridiculous policy is adopted. We will maintain our standards of biosecurity but will undertake no more testing.

Rod Hoare

Cadfor Murray Greys - The Quiet Achievers

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I have read with interest the BJD – Where to from here report. I support the proposed changes.

A couple of comments.

1. Presumably once a PIC is identified as “infected” there is a potential for this to negatively impact sales to some markets in a free trade economy. If a producer wishes to pursue control measures to eradicate Johnes I do not currently see a way for them to document eradication and attain a disease free status on their PIC.
2. In New Zealand where PIC is used for certifying declarations of disease status producers with multiple PICS sometimes sell stock from infected farms by moving them to a PIC which has not had a history of disease. To avoid the same scenario a contingency for this manipulation of the system would need to be developed.

Regards

John House

Sydney University

Kimberley Cattlemen's Association's Submission on the Latest Animal Health Australia Draft Framework Document.

"BJD – Where to from Here"

5) Developing the new approach: Background

JD in cattle is endemic in some cattle production areas of Australia but in other areas the disease is not known to exist (or exists at a low to very low level). A review of the *National BJD Strategic Plan 2012-20* undertaken during 2015 included a thorough consultation process to evaluate the plan and make a decision on future national management arrangements.

Response: *There has been significant consultation with all stakeholders with opportunities to provide submissions to all discussion documents. We accept that this consultation has been open, transparent and fair.*

6) The need for a different approach

The review identified that there was a groundswell of support for JD to be dealt with differently from the way in which it has been over the past 12 years. There was general support for JD to be addressed under a common biosecurity approach for endemic diseases, with less emphasis placed on an individual disease. It was not appropriate for the existing strategic plan to continue in its current state. Through an extensive consultative process a revised plan has been developed for implementation in early 2016. This has been a collaborative effort of industry and governments.

Response: *Support that JD should be treated as any other endemic disease within Australia. The current national program has caused significant economic and emotional hardship to producers affected by the recent BJD incident in the Kimberley. Compensation provided by the WA Cattle Industry Funding Scheme has only covered loss of traced bulls that have been slaughtered and tested, with no recognition of the ongoing genetic loss as well as the significant costs of importing bulls into WA under very strict import requirements.*

The likelihood of BJD actually spreading and being transmitted in a hot and dry environment is very low, and the current national program was never written for BJD occurring in the pastoral setting in northern Australia. We acknowledge that this may differ to the views held by stud breeders, and the beef and dairy industry of southern WA, but it should be recognised that there is no compelling reason for controlling BJD in northern Australia under a regulatory framework.

8) Fundamental objectives

The objectives of the recast Management Strategy for JD in cattle are to:

- Manage and reduce the impact of clinical Johne's disease; and
- Provide tools to allow individual producers to manage the spread of *Mycobacterium paratuberculosis* infection in accordance with their business requirements

Response: *We support the view that individual producers should manage the risk of JD on their properties without government or regulatory restrictions that unduly impact on the*

economic viability of the properties business. Where there is deemed a very low risk of transmission or spread of JD in a region of Australia, it should be accepted that as agreed in the Intergovernmental Agreement on Biosecurity (ICAB) in 2012 7.15-7.17:

“To support the operation of effective and efficient biosecurity controls and facilitate interstate trade, the Parties agree to limit the application of interstate biosecurity measures to the level necessary to mitigate risks to the economy, the environment and community.....there will be provision for the development and maintenance of regional pest and disease status subject to provision of scientific evidence to define and support it..

9) Principles of Strategy

The principles of the new approach are to incorporate the management of JD in an overall biosecurity framework for endemic cattle diseases (the proposed *Management Plan for Cattle Production Conditions 2016-21*) are to:

- **Focus** more attention on biosecurity and less on individual diseases in matters of farm management
- **Improve** the biosecurity credentials of Australia’s cattle industry
- **Ensure** the presence of a biosecurity buffer between properties to minimise the spread of endemic and exotic diseases should one occur.
- **Reduce** the prevalence of economically important production diseases and improve the management of these diseases where they occur
- **Establish** a biosecure environment within which producers may trade livestock with minimal risk if they so wish
- **Seek** improvements in diagnostic tests, vaccines and management practices that will provide economic benefit to producers having to manage these diseases
- **Obtain** as great a level of consistency as possible between States and Territories in managing endemic production diseases
- **Facilitate** business and trade, whether it be local, national or international
- **Lower** costs and lessen the regulatory burden associated with endemic production diseases.

Response: *Support the principles of the Strategy*

10) Biosecurity as the wider reference

JD is only one of the many diseases that producers must guard against and in managing their business. Biosecurity is concerned with the reduction and management of the risk of diseases, among them JD. Better biosecurity awareness and practices provide a safer environment for producers to operate. For that reason, they are at the centre of this approach.

Response: *Support the approach provided that government helps support pastoralists and enables transitioning to biosecurity plans and programs through education and tools to better understand the risks.*

11) Primary focus of the new approach

The new approach takes the business interests of producers as its cornerstone. It places in their hands the assessment and the management of opportunities and risks associated with the pursuit of these interests.

Response: *Producers should be supported by government and private sector to better assess the risks associated with the management of opportunities – biosecurity is a shared responsibility. Programs need to be developed with industry involvement and ownership to ensure the outcomes are both economically sound for individual businesses as well as addressing potential biosecurity risks.*

12) The new approach reflects a shift in thinking

In that respect, the new approach introduces a substantial shift in thinking: it requires no State (or Territory) regulation to manage endemic diseases such as BJD. It recognises the role of the producer as the interested and empowered decision-maker.

Response: *supports this approach in regard BJD as it has been demonstrated that there is no effective non-lethal testing to diagnose the disease early in an animal's life that is both accurate and repeatable. Without effective testing there is an inability to control the disease.*

13) Extensive education and communication effort

It is accepted by industry and State and Territory governments that the successful introduction of this approach will require a substantial education and communication effort to assist producers (and interested stakeholders) in understanding the new model, its operation and its effects. The education and communication effort will be channelled through Animal Health Australia.

Response: *As per the IGAB 2012 – biosecurity is a shared responsibility, there must be effective transitioning so that producers understand the disease itself, its risks and what the impacts are economically from control, management or prevention if BJD enters the herd.*

14) Funding

Under the plan, it is intended funding will would be sought for:

- Extension and communication activities that will provide producers with information about biosecurity and the management of endemic diseases of which JD in cattle is just one. This needs to be focused on adoption rather than simply raising awareness

Response: *Supporting adoption rather than awareness is always a better outcome for biosecurity programs. Where will this funding come from?*

- Further development and refinement of existing risk assessment tools, such as the National Cattle Health Statement (CHS), regional biosecurity programs, One Biosecurity, and other existing risk management programs to assist producers in making informed decisions when moving or trading cattle

Response: *all programs that have an ability for producers to maintain a good level of biosecurity, disease free status to enable trade to different markets is commendable. Uptake and simplicity must be first in the development of any program so that it is understood and supported by individual producers.*

- Developing an effective system for monitoring individual herd endemic disease management programs, and for use as an assurance tool in low-risk herds. Abattoir monitoring for endemic diseases, certification procedures and a feedback system are important examples

Response: *How will this information be used and implemented by government? Any certification and surveillance will have both a negative and positive side, with the collation of data, there is a risk that it can be used in a counter productive means for certification of market demands outside the control of producers. There must be stringent objectives and aims developed to ensure that producers have full ownership of and understand the “why” behind any monitoring program that may have significant economic impact to their businesses.*

- Ongoing research and development to help producers minimise the impact of endemic diseases on their businesses, specifically in the areas of diagnostics, management practices and vaccination.

Response: *Support R&D in agriculture that will help improve market and trade access for producers.*

15) New approach will replace existing SDR&Gs

Once finalised, the approach described in this paper will supersede the current BJD Standard Definitions, Rules and Guidelines (the SDR&Gs) published by Animal Health Australia on behalf of the Australian Animal Health Committee.

Response: *Simplification of the national program is needed*

16) Current SDR&Gs apply until formally set aside

Until such time as the new approach has been finalised, the present approach (as set out in the existing BJD SDR&Gs) will continue to apply.

Response: *Support this position*

17) The property is at the heart of the new approach

The property (and its identification code or ‘PIC’) is the unit of interest at the heart of the new approach – and the point of reference in all matters of assurance and certification.

Response: *Support this position as it currently underpins market and trade access for producers*

18) The concepts of zones and surveillance will be set aside

The original concept of zones (‘free’, ‘protected’, etc.) relied on surveillance to support the low-risk claims associated with free and protected zones. As cost-effective surveillance for JD in cattle cannot be achieved, it follows that the use of zones will not be supported in the future. Zones, protected areas and compartments will not be part of the new approach.

Response: *If cost effective surveillance for BJD is not achievable as outlined in point 6 and 12, then zoning is simply not possible. As such this approach is practical and inevitable.*

19) The property as the true focus of risk and opportunity management

In making properties rather than zones or areas the point of reference, the new approach:

- **Relocates** risk at the point at which it can be effectively managed
- **Aligns** the logic of the system to the point of reference in any commercial transaction
- **Transfers** the responsibility for managing the risk of JD (and other diseases) from government agencies to individual producers.

Response: For producers in northern Australia as pointed out in 6 and 12, BJD is a disease of low impact to market and trade access. There are more important diseases that are actually impacting on the economic return of properties, including pestivirus, vibriosis and botulism.

20) Shared status between neighbouring properties does not constitute a zone or area

Nothing in the new approach prevents producers whose properties and herds enjoy a similar risk profile to combine in promotion for commercial advantage. Similarly, producers may act collectively to manage their risk.

Response: The ability of producers to potentially manage a disease or pest of impact to the region through the Recognised Biosecurity Group (RBG) in WA is an avenue that producers could explore, this approach is acceptable and practical.

21) Freedom to trade

The new approach imposes no regulated transactional or movement restrictions on producers: under the new regime producers may trade with any producer they wish, irrespective of location, provided the buyer believes the cattle to be suitable and they comply with the movement requirements of the state/territory the cattle are moving to. It is the responsibility of the seller to provide the herd-health information sought by the buyer, whose interests are protected by Common Law.

Response: Support this approach. Through adequate assessment of what the individual business is accepting of the potential risks, it also gives individuals the ability to import better genetics that has not been possible to date.

22) Industry and trade requirements are the determining references

The new approach recognises the different requirements of the dairy and beef cattle industries. It also recognises that each industry or market defines and sets its own quality standards, conditions and limitations, to which producers are held.

Response: Support this approach. Currently southern producers in WA seem to have control of what happens with import requirements in WA, the BJD incident in the Kimberley is a clear example of how southern producers supported restrictions that affected the economic viability of northern producers without accepting the significant financial and psychological hardships of maintaining the "status quo" to protect their perceived markets. It is imperative we work together for the best interests of the State, not just a select few.

23) Risk and opportunity management in the hands of the producers

Within (a) the constraints that industry standards and requirements impose and (b) the particular market or industry that producers choose to serve, producers are empowered to make commercial decisions about the risks and opportunities associated with the cattle that they are thinking of purchasing or selling.

Response: Support this approach, this is currently happening for producers on other more important endemic cattle diseases.

24) Informed decision-making and risk management

Risk is best managed through informed decision-making. Informed decision-making requires tools to be available, through which producers can better assess the health status and risk profile of cattle that they are considering for purchase or sale.

Response: Support this approach

25) A variety of risk management and decision-support tools

The new approach calls for the development of easily-accessible, simple-to-use and (preferably) Web-based tools that will assist producers in buying or selling cattle based on the biosecurity risks involved. The tools will be industry-developed and industry-driven, to ensure that they are sensitive to – and reflect – the requirements of specific industries and markets.

Response: Support this approach.

26) Forming views on key considerations

Broadly speaking, the tools will help producers ask the questions that will assist them in forming a view about:

- **The level of biosecurity assurance** and practice associated with the management of the source property and herd and its match with that of the destination property.
- **The specific health status of the cattle** on offer and of the herd from which they are drawn.
- **The management and biosecurity practices** that can be implemented to improve JD management within their herds

Response: Support this approach

27) Reduction of risk and informed decision-making

The aim of the tools is to help the producer develop as informed a view as possible – and thus as informed a purchasing decision as possible – about the health status of cattle offered for trade. This would include information about JD among other diseases.

Response: Support this approach – JD is the focus of this paper, but whatever tools are developed should also be able to be applied to other endemic diseases of importance to producers.

28) Three key types of tools

The risk-assessment and decision-support tool kit will feature three key instruments:

- **A list of ‘top tips’**, effectively a buyer’s checklist for the purchase of cattle
- **A risk profiling tool**, designed to estimate a herd’s risk based on various on-farm biosecurity practices and testing history
- **Cattle health declarations (CHD)**, focussed on specific treatments given to the cattle being consigned or the risk level of the herd from which the cattle come.

Response: Support this approach

29) Upgraded Cattle Health Statements

The existing National Cattle Health Statement will be substantially enhanced. Any declaration on an animal health declaration is underpinned by consumer law. In particular, the next generation of cattle health statements will:

- **Be simplified** to take away some of the present complexity (e.g. by using 'yes' or 'no' answers to straightforward questions)
- **Comprise** a set of general questions applicable to all transactions
- **Include** information about JD *as well as* other diseases
- **Be made** readily accessible via electronic format and linked to National Vendor Declarations (NVDs).
- **Include** regulatory support to prevent the provision of misleading information

Response: Support this approach.

30) Freedom to design and use further tools

Groups of producers active in the same industry and markets whose properties and herds enjoy a similar health status are at liberty to add to these generally available tools if they see benefit in providing additional guidance and protection for their type of business.

Response: Support this approach

31) Property and regional biosecurity plans ('RBPs')

Producers will be encouraged to develop property plans, property cluster plans and/or regional biosecurity plans ('RBPs') – or be involved in biosecurity-focused verification systems. These plans will outline how groups of producers will be able to detect, control and manage endemic diseases with the aim of minimising the spread of endemic conditions.

Response: Support this approach.

32) Improved risk assessment instrument will replace the current CattleMAP

The current Market Assurance Program ('MAP') for cattle (CattleMAP) will be reviewed and alternative assurance tools will be reviewed/developed that make participation worthwhile and:

- **Serve** as positive marketing tools
- **Support** the introduction of the new approach to dealing with JD in cattle; and generally
- **Add** to the range of assurance tools that industry and producers can readily use in support of informed decision-making and practice improvement.
- **Be owned and operated by industry.**

Response: Support this approach

33) Current MAP requirements will apply until CattleMAP is formally set aside

Until such time as the successor instrument to the present CattleMAP is introduced, requirements associated with the current CattleMAP will remain in force.

Response: Support this approach

34) Presence of JD

The presence of JD in a herd means that:

- A clinical case of the disease is identified and/or confirmed by definitive testing; OR
- Infection with *M. paratuberculosis* is confirmed in an animal that may not be showing clinical signs.

Response: Clarification of first point, “OR” should be removed, to access export markets it is not in the producers interest to have a scouring low body condition animal diagnosed as clinical JD without confirmation of actual causal organism. The second point should also be deleted – clinical cases should be the only definition of presence of BJD in a herd.

35) Strain of JD not relevant

Distinctions between the infecting strain (‘B’, ‘S’ or ‘C’) are not relevant to the determination of the presence of JD.

Response: Support this position – from previous review meetings, further research is needed in this area in regards impacts different strains may have, as well as the transmission of the disease

36) Tests and testing for JD

Sound information on tests and testing is essential to the guidance and education of producers.

Response: Strongly supports this position

37) Understanding the nature and limitations of tests and testing

In that regard, it is particularly important that the information provided on tests and testing allows users to understand:

- Available tests and their use (and improvements made to them over time)
- The level of risk reduction (and thus the relative certainty) that tests bring
- The limitations of the various tests (i.e. what tests cannot show and thus what cannot be inferred from their use).

Response: Strongly supports this position

38) Interpreting and understanding the results of JD tests and testing

Professional advice should be sort when interpreting test results. Veterinarians have a key role in providing advice to producers on biosecurity risks and recommended management practices including on the application and interpretation of diagnostic tests.

Response: Both from a government and private sector – veterinary support is crucial to the ability for producers to understand and implement the best biosecurity practices possible that will support economic success.

39) Regulation will not be mandatory for JD in cattle

Properties where JD is diagnosed will no longer be required to have quarantine orders applied or regulated movement restrictions.

Response: Support this position

40) Quarantine-related compensation will not apply for JD in cattle

In the absence of quarantine, compensation for affected producers is not appropriate. It does not form part of the new national approach.

Response: Has this ever been the case?

41) Commercial impact of JD manifesting on a property will vary

The commercial consequences of the presence of JD on a property will vary depending on the requirements of buyers of cattle from that property.

Response: Support this position – on face value the compelling case for regulatory control of BJD in northern Australia does not seem to be present.

42) Continuance of trade for a JD affected property

Buyers for whom infection of cattle with *M. paratuberculosis* is not a commercial consideration may choose to purchase cattle from JD-affected properties.

Response: If it is not regulated, then there is no ability to stop individual producers from doing this.

42) Status disclosure

Disclosure of JD status is recommended but not mandatory unless the purchaser requests the information.

Response: for the sake of minimising spread and impact of BJD – there shouldn't be an ability for a producer to falsely declare or withhold that information. Based on commercial transactions, declarations should be developed to ensure producers declare if they have BJD or not.

43) Producer driven JD History disclosure

Producers that purchase cattle will determine the conditions they purchase under, disclosure by the seller will be driven by requests for information on the cattle/property's JD history. Information provided may be subject to Trade Practice legislation.

Response: Accept this position – but as in point 42 health statements of declarations that are attached to NVDs should ensure that producers that know that they have BJD in their herds declare this status

44) Pathways and plans to reduce the risk of JD incidence on an affected property

Owners of JD-affected herds will be able, if they choose, manage and demonstrate the steps taken to reduce the occurrence of JD on the property. The pathway for this will be set out in industry-based assurance programs.

Response: Support this position

45) Use of JD risk-reducing pathways and plans is voluntary

The use of pathways or plans is voluntary. The development, adoption and implementation of pathways and plans will be undertaken by property owners where they see benefit in

showing that they have adopted practices intended to lower the risk of JD in their herds (and/or returning them to a more desirable level of market assurance).

Response: *Support this approach*

46) JD risk-reducing pathways to be species and industry specific

JD Pathways and plans will be species- and industry-specific (e.g. sheep, dairy, beef cattle, etc.).

Response: *Support this approach. What works for southern WA producers may not work for northern Australian pastoralists.*

47) Trace-forward and trace-back

When JD is found in a herd and while industry protocols and good business practice may encourage trace-forwards and trace-backs, the decision to do so rests with the producer of a JD affected property. Tracing will be strongly encouraged.

Response: *Producers that sell stock to properties should inform their clients if diseases are diagnosed that may impact on the buyer's business.*

48) Notifiability of JD in cattle

JD in cattle remains a notifiable disease. In reaching this position, regard has been had for the World Organisation for Animal Health (OIE) and specified trading partner positions in regard to the disease. It is important to note that notification of disease in a herd will not require the relevant government to take any action (other than keep a record of the affected PIC for export certification purposes), but an investigation may be undertaken.

Response: *In what way may an investigation be undertaken and for what purposes?*

49) JD notification records

Notification of the presence of JD will be supplied to, and held by, the relevant government department (as it is at present). The jurisdiction will use the information to satisfy international export certification requirements.

Response: *Support this position.*

50) Life of JD notification records

Jurisdictions will continue to keep records of notified cases, as they do currently. The records are kept indefinitely for certification purposes. Notifications will not result in action being taken by the jurisdiction against the PIC owner.

Response: *Support this position as is currently the circumstance for Property of Origin Certification.*

51) Defining surveillance

Surveillance is understood to mean the sum of the collation of JD notifications (as supplied by producers and testing organisations/authorities) and of the results of additional support testing that may be undertaken. By definition and intent, the notion of 'surveillance' is a passive (rather than active or interventionist) one.

Response: *Support this position however it should be clearly defined what the surveillance will be used for and how the use of the data may have affected individual producers.*

52) In pursuit of quality assurance

The new approach recognises that producers may wish to introduce and undertake, at their expense, additional monitoring of their herds, in pursuit of higher quality assurance. Tools for additional monitoring will be described in industry-based assurance documentation currently being prepared.

Response: *Support this position*

We give our full support to the WA Farmers Federation and the other WA lobby groups,
fighting to keep WA's free BJD Status

Yours sincerely

Rose King
Spring Valley Charolais, PO Box 262, Donnybrook. WA. 6239

Mark King
Brighton Farms Simmentals, POBox 262, Donnybrook. WA. 6239

Dear BJD Review Team

I was disappointed not to see any emphasis on vaccination in the final draft of the BJD framework, specifically in section 44 which deals with managing infection. The document does mention development of risk-reducing tools as part of industry QA programs, and presumably vaccination will be one of these tools. However as a veterinarian I believe a document such as this which provides an overarching framework for management should include mention of vaccination as a fundamental principle of dealing with JD infection.

Kind regards,
Melanie Latter

Dr Melanie Latter
Veterinarian
Murrumbateman NSW 2582.

TO THE BJD REVIEW

ITS A SHOCK TO SEE THAT AFTER NEARLY 20 YEARS YOU HAVE JUST ABOUT ADOPTED THE JOHNES ALLIANCES POLICIES.

THE ATTACHED SUBMISSION TO THE SENATE INQUIRY IS NEARLY 10 YEARS OLD

IN THE MEANTIME THE GROUP NOW IDENTIFIED AS THE REFERENCE GROUP CAN BE IDENTIFIED AS THE GROUP TOGETHER WITH NATIONAL PARTY MEMBERS OF PARLIAMENT WHO WERE RESPONSIBLE FOR THIS BLIGHT ON AUSTRALIA'S AGRICULTURE.

PAT MCNAMARA THE THEN VICTORIAN MINISTER STARTED ALL THIS ONE NIGHT IN BENALLA WHEN HE DID A DEAL WITH THE VFF "HE SAID I WANT TO CLOSE THE VET LABS IN HAMILTON , BAIRNSDALE AND BENALLA DOWN AND IF I DONT GET ANY GRIEF I WILL GIVE YOU A \$1 million TO ERADICATE JOHNES "HE AT LEAST HAS SINCE APOLOGISED

THIS TOTALLY FLAWED POLICY WHICH IS BACKED BY THIRD WORLD SCIENCE AND TOTALLY FAILED TO EXAMINE THE SOCIAL IMPACTS IS A REASON WHY, MANY FARMERS HAVE LOST TRUST IN THE VETERINARY PROFESSION AND GOVERNMENT VETS IN PARTICULAR

THE REVIEW FAILS TO ACKNOWLEDGE THAT THOSE RESPONSIBLE GOT IT HORRIBLY WRONG

YOU AS THE RESPONSIBLE ENTITY SHOULD FOLLOW MCNAMARA AND APOLOGISE

THE QUEENSLAND NATIONAL PARTY MINISTERS WHO PROMISED PROPER COMPENSATION WERE ALSO SHOWN TO TELLERS OF UNTRUTHS

FURTHER MORE I AM DISMAYED THAT THE map HAS NOT BEEN STOPPED BY NOW

THE WORST FEATURE OF THE map IS THAT NO ONE CAN GIVE AN ASSURANCE given the biology of the organism AND THE TEST AVAILABLE,

ANYONE THAT GETS A FALSE POSITIVE CAN HAVE THERE BUSINESS PUT ON ICE FOR UP TO 6 MONTHS THE STRESS IS IMPOSSIBLE TO UNDERSTAND

THE OTHER DISGRACEFULL FACT IS THAT THE WHOLE POLICY WAS SUPPORTED BY SOME STUD BREEDERS WHO STILL SEE IT AS A MEANS OF TRADE RESTRICTIONS TO KEEP COMPETITION OUT OF THERE MARKET

THIS WAS ORIGINALLY SUPPORTED BY ANGUS BREEDERS IN THE HOLBROOK AREA WHO WANTED TO KEEP VICTORIAN ANGUS OUT , THEN IT MOVED TO WA SHEEP BREEDERS WHO WANTED TO KEEP THE NSW RAMS OUT OF THERE MARKET , NOW WE HAVE WA BULL BREEDERS KEEN TO KEEP QUEENSLAND BRAHMAN'S OUT CATTLE COUNCIL MEMBERS WHO ALSO RUN SHEEP HAVE ALSO BEEN COMPLICIT

BUT NOW THAT IT IS ACKNOWLEDGED BY THE REVIEW THAT JOHNES IS JOHNES THANK GOODNESS THEY HAVE GONE TO WATER

SUMMARY

THE REVIEW IS A STEP FORWARD BUT IT FAILS TO ADDRESS THE ISSUE OF COMPENSATION

FAILS TO CALL AN IMMEDIATE STOP TO THE MAP THIS I GUESS IS NOT SURPRISING AS THERE IS ONLY ONE REAL WORLD FARMERS WITH EXPERIENCE WITH THE REAL IMPACT OF WHAT HAS BEEN DONE

HE HAPPENS TO BE A DAIRY FARMER IT WAS THE DAIRY INDUSTRY THAT SHOWED THE WAY FORWARD MANY YEARS AGO WITH MANAGEMENT PLANS

HOWEVER JOHNES STILL IS ON YOUR SECTION 32 WHEN A PROPERTY IS BEING MARKETED

FOR THOSE OF US PRODUCERS WHO WERE FORCED TO BE IN THE map TO TRADE WITHIN AUSTRALIA I LOOK FORWARD TO RECIEVING AN APOLOGY

SO THAT WE CAN NOW MOVE FORWARD

DON LAWSON OAM

ON BEHALF OF THE AUSTRALIAN JOHNES ALLIANCE

Midlands Cattle Breeders' Association

President: Tony Sudlow
PO Box 19
NORTHAMPTON WA 6535
tony.lizsudlow@bigpond.com



To Animal Health Australia

Submission from Midlands Cattle Breeders' Association (MCBA)

Re: BJD: Where To From Here?

The Midlands Cattle Breeders' Association (MCBA), established in 1975 is an organisation of beef producers that represents a large cross section of growers in the Midlands region of Western Australia. We conduct one the state's most respected Multi Breed Bull Sale in Gingin each year. Next year will be the 28th annual sale.

Our organisation strongly opposes any changes that puts at risk Western Australia's BJD free status. This view is in line with the vast majority of producers that were present at the recent BJD review forum, held in Perth on August 11th.

Could you please ensure our views are presented, as any change to the BJD free status of Western Australia would have a significant financial impact on our members?

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Sudlow'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tony Sudlow.

President
MCBA

16 November 2015

17th November 2015

From Jim and Pam McGregor, beef producers, Kojonup WA

Ph: 08 9831 0401; Email: MAYBENUP@bigpond.com

To Animal Health Australia

Re: BJD: WHERE TO FROM HERE?

This document, in our opinion, raises many more questions than it provides direction for the future. People and organisations making submissions are being asked to take a great deal on trust.

At the Perth Forum on 11th August, lack of clarity with reference to Discussion Paper Two was mentioned; we are of the opinion that AHA has not taken that constructive criticism on board in the preparation of this document and wonder why not????

In addition, having two paragraphs 42 as well as the absence in some places in the document of clear understandable English (eg the opening sentence of paragraph 9) would suggest that the document has been prepared in some haste, even although it was released two weeks later than originally planned. Pam did speak to Mr Duncan Rowland about this and he informed her that the industry had requested the review be done quickly; Pam's response was that properly was more important than quickly.

Ten months consultation to substantially change an important part of an industry, and giving just over two weeks for submissions at a very busy time of the year is not acceptable.

It is clear to us that the push for zoning removal and movement deregulation is coming from the eastern states segment of the industry; while we accept that there are many more cattle and many more beef producers in the eastern states and territories than there are in WA, that does not mean that the voices of WA producers should be ignored.

In our opinion, the document does not stay true to the original aim of the review which was to review the National BJD plan in that, in particular, it has lumped BJD with other endemic diseases [eg in paragraph 9] in Australia. This is not at all acceptable.

Paragraph 6 states that the review identified "that there was a groundswell of support for JD to be dealt with differently from the way in which it has been over the past 12 years". No clarity from where that groundswell has come from but we would suggest that it would not have been from Western Australia. There are several equally vague statements in the document: 'general support' in the same paragraph; paragraph 14 Funding states that funding will be sought for a variety of actions but no detail about where the funding will be sought from and it completely contradicts the statement in paragraph one, giving reduced funding as one of the reasons for the change! And, yes, we know that funding can come from a whole range of sources and they do change but there's a bit of contradiction here!

Fundamental objectives:

8 The objectives of the recast Management Strategy for JD in cattle are to:

- * Manage and reduce the impact of clinical Johnes' disease; and
- * Provide tools to allow individual producers to manage the spread of *Mycobacterium paratuberculosis* in accordance with their business requirements

In our opinion the recast Management Strategy does not and will not fulfil these two objectives because

1. setting aside the current zones (paragraph 18) removes important information available to the producer for making decisions about stock purchases;

2. the freedom to trade (paragraph 21) approach means cattle can move anywhere in the country, resulting in BJD entering and establishing in areas currently free of the disease
3. in many places throughout the document mention is made of tools (for example including but not exclusively the following: paragraph 2 'additional papers; paragraph 9 'proposed *Management Plan for Cattle Production Conditions 2016 – 2021*'; paragraph 13 'substantial education and communication effort to assist producers [and interested stakeholders] in understanding the new model, its operation and its effects; in paragraph 14 – several references to new material; paragraph 25 '. . . the development of easily-accessible, simple-to-use and [preferably] Web-based tools . . . industry-developed and industry-driven . . .'; paragraph 28 'Three types of tools'; paragraph 52 'industry-based assurance documentation currently being prepared.) A phone call to AHA's Mr Duncan Rowland last week elicited the information that preparation of all these tools will start after final decisions are made on the new approach which according to the AHA website is due to be presented to the public in Sydney on 15th December. The only safeguards for producers, especially perhaps in WA are paragraphs 16 (Current SDR & Gs apply until formally set aside) and 33 (Current MAP requirements will apply until CattleMAP is formally set aside).

Principles of Strategy

The nine dot points mentioned in Paragraph 9 (although the English in the introductory sentence doesn't really make sense!!) outline the principles of strategy. While this section states that the principles of the new approach is to incorporate the management of JD in an overall biosecurity framework for endemic cattle diseases, dot point 6 'seek improvements in diagnostic tests, vaccines and management practices that will provide economic benefits to producers having to manage these diseases' was one of the points raised several times by Pam during the Perth Forum as we strongly feel that a reliable single live animal test for BJD is very necessary before any changes are made to the way BJD is managed in Australia.

Most of the other dot points are very general in nature and raise more questions than provide direction.

But:

Dot point 2 in paragraph 9 states "Improve the biosecurity credentials of Australia's cattle industry". The proposals in the new approach to remove the zones and have no regulated transactional or movement restrictions on producers in no way meet that principle of strategy.

We strongly disagree with dot point 7 as far as dealing with BJD is concerned in that WA manages BJD well. It does seem that the document plans to drag WA down to the current BJD situation in much of the eastern states and territories.

We understand that widespread intensive testing, strict movement protocols with comprehensive Border Board Control some years ago established WA's BJD Free Zone status; intermittent testing and surveillance since then on possibly suspect animals has resulted in action being quickly taken until the properties were cleared of the disease. To remove that status without a widespread but targeted testing process is not at all acceptable and we strongly oppose any decision to do that until that reliable single live [especially young] animals test has been developed and then used to confirm (or otherwise) WA's BJD Free Zone status.

We do wonder whether in dot point 8 'Facilitate business and trade, whether it be local, national or international' is intentionally ignoring WA's BJD Free Zone status' advantage in exporting to several overseas markets.

There is no doubt in our minds that removing zones and freedom to move cattle anywhere in Australia will disadvantage WA's export markets as BJD will undoubtedly disadvantage WA – and that is totally contrary to Appendix C, dot point 3 'Ensure that parties transition to the new program without disadvantage' so again, we strongly object to the removal of zoning and introducing the freedom to trade [paragraphs 18 and 21].

Biosecurity as the wider reference is the heading of paragraph 10 – the suggestions contained therein seems to assume that beef producers aren't aware of the need for good biosecurity in their business operation. We reject this completely.

In paragraph 11, the 'new approach' places total responsibility for dealing with BJD with the producer but without the information currently available which helps producers make purchasing decisions. As beef producers, we currently take responsibility for the biosecurity on our property, especially as far as bringing new animals into our cattle herd, so we have no problems with the proposal that producers take responsibility; our objection is that the document seems to think beef producers don't do that at the moment – quite absurd thinking which we totally reject.

Paragraph 12 talks about the substantial shift in thinking introduced by the new approach – it certainly is substantial! Our concern is that this shift is basically flawed. Dealing with shifts or changes is a constant part of being a farmer as we have to accept and deal with the day-to-day challenges Mother Nature gives us. What we don't accept about this document is the apparent disregard for the views of WA producers – we understand the Perth Forum was by far the best attended of all the forums held in this review. We repeat that while we accept that there are many more cattle and many more beef producers in the eastern states and territories than there are in WA, that does not mean that WA producers should be ignored.

So many of the paragraphs in the section FUNDAMENTALS OF THE NEW APPROACH: DEALING WITH JD INFECTION (paragraphs 17 to 52, including two paragraphs 42???) are incredibly loose and worry us immensely. We have already mentioned that implementing paragraphs 18 and 21 will not fulfil the fundamental objectives detailed in paragraph 8 and again make that point. Having the property at the heart of the new agenda [paragraph 17] is fine though we suspect it already is for most beef producers but, if implemented, this new approach removes the main information tool for decision making – the current zoning. We [again] strongly reject this proposal.

More examples:

Paragraph 23 – producers are currently empowered to make decisions about risks and opportunities but need the information provided by zoning.

Paragraph 24 talks about informed decision making while removing the main source of information about BJD. Why would that be done??????

Paragraph 35 states that distinctions between the infecting strain ['B', 'S' or 'C'] are not relevant to the determination of the presence of JD. While OJD is endemic in WA, there is, as far as we are aware, no evidence that the 'S' strain from OJD is passed from bovine to bovine if a bovine is infected by the 'S' strain. We strongly suggest that distinctions are therefore very relevant.

Paragraph 42 (the second paragraph 42!), states disclosure is recommended but not mandatory, which places all the responsibility on the buyer. (That's fine – we operate on the Buyer Beware concept always in our business operation, but there is no doubt in our minds that adoption of these fundamentals will certainly see BJD establish in WA – and that is a very avoidable scenario!) So while we accept increased responsibility on the buyer, that's another of many loopholes which need filling.

While BJD is to remain a notifiable disease (paragraph 48), that notification requires no action from the relevant government although "an investigation may be undertaken". MAY????

And in paragraph 47, Trace-forward and trace-back, it is stated that tracing will be strongly encouraged. So not mandatory even though it is a notifiable disease????? Why?????

It is also essential that Appendix B: Finalising and introducing the new approach which identifies the six steps in the process (with absolutely no time line included) will not see step 6 happen until Note 11 (Promulgation of the new approach must make clear the role of industry programs in the changed framework) is completed. There is a timeline on the AHA website giving 15th December as the date for the presentation to the public [Sydney] with the location to be determined. The big question is why the rush?

When that question was put to AHA, the response was that was their instruction; we responded that we thought it much more important to do the review properly than quickly. That remains our very strong position. We repeat: ten months consultation to substantially change an important and major part of an industry, and then giving just over two weeks for submissions at a very busy time of the year is not acceptable.

Given that in Appendix C: Devising a suitable risk assessment instrument, the workshop participants argued that the instrument should, in dot point 3, “ensure that participants transition to the new program without disadvantage”, there is therefore no valid reason for removing the current zoning. Removal of WA’s BJD Free Zone status will undoubtedly disadvantage WA and any economic impact assessment would easily confirm that. Of course that assessment has not (as far as we know) been undertaken.

In conclusion, we repeat (perhaps more succinctly than above!):

1. We strongly object to the lack of clarity and definition in the document upon which we are asked to make submissions;
2. We strongly object to the lack of definite timelines for the development of tools, and therefore for the new approach coming into effect;
3. We strongly suggest that the statement in Appendix C “ensure that participants transition to the new program without disadvantage” means that removal of zoning and movement transactions is not at all valid;
4. We strongly oppose removal of WA’s BJD Free Zone status;
5. We totally support development of better reliable tests for BJD for single live animals and strongly object to any changes to zoning and cattle movement until those tests are developed and available for industry use;;
6. We strongly state that the proposals included will not “Improve the biosecurity credentials of Australia’s cattle industry” [paragraph 9, dot point 2] so they should not be implemented.

So our suggestions for BJD – WHERE TO FROM HERE?

Priority 1 – delay implementation of much of this final discussion paper.

Priority 2 – develop reliable test or tests to identify the presence of one of the three strains of BJD in live cattle, especially young cattle.

Priority 3 – once that test is available, use it in WA in a widespread but targeted testing process to confirm [or otherwise] WA’s BJD Free Zone status.

Priority 4 – re-visit this review process.



OUT15/31658

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

Dear Duncan

Re: Review of the National Bovine Johne's disease ('BJD') Strategy: BJD- where to from here? A fresh approach to the Management of Johne's disease in cattle: Management plan for cattle productions conditions

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

Overall Comments

- NSW supports the general principles described in the paper. However as with previous versions, the writing style means that these may be interpreted differently due to the reader's preconceived views on BJD management. The previous response from NSW stated that the third discussion paper will need to provide clear detail about the recast strategy. This paper fails to provide sufficient detail to have clarity about what is proposed to be introduced.
- NSW has serious concerns about the wording of 34-Presence of JD and 35-Strain of JD not relevant. The current wording will lead to difficulties for Government Veterinary Officers to certify properties. Further detail is provided below in specific comments including suggested wording.
- NSW notes the papers refer to a number of yet to be developed or modified plans, statements and programs. Until these are available, it is impossible to know the details of the proposed management of BJD.
- NSW notes the new approach comes in to effect at the nominated date. The Animal Australia HA web site accessed 11 November 2015 stated "with a view to implementing the resulting revised program by February 2016". Successful implementation of the revised management will require a well considered and communicated transition plan. Given a number of critical details are yet to be developed, it appears that commencement in February 2016 will make for an unsatisfactory transition. It is critical that Animal Health Australia develop and publicise this transition plan.

Specific Comments (numbers refer to paragraphs)

- Re 9 – Biosecurity is an often used but poorly understood word. The statement that the plan will "focus more attention on biosecurity and less on individual diseases" is likely to result in further misunderstandings. Biosecurity can be understood by providing examples from a variety of diseases and their respective causal agents. Reference to "biosecurity credentials", "biosecurity buffer" and "biosecure environment" will need to be explained in the Plan.

NSW considers this approach overstates what it can achieve by the yet to be developed yet to be developed or modified plans, statements and programs. For example, by removing tracing from infected herds (47), it will not be possible to:

- "Improve the biosecurity credentials of Australia's cattle industry
- establish a biosecure environment within which producers may trade livestock with minimal risk if they so wish
- facilitate business and trade, whether it be local, national or international"

Thus declarations made by vendors (and animal health officers) in good faith are likely to be based on incomplete/inadequate knowledge. NSW is not arguing to retain the current level of regulation but wants industry to be clear about the challenges of the revised approach.

- Re 12 – the statement “..it requires no State (or Territory) regulation” is incorrect. As the document requires that the States and Territories are required to make Johne’s disease notifiable, it should read “ ..it requires State (or Territory) regulation to make Johne’s Disease notifiable”.
- Re 13 – the challenges of a successful education and communication effort to assist producers (and interested stakeholders) in understanding the new model, its operation and effects should not be underestimated. A rushed implementation increases the likelihood of failure. Industry needs to be aware of the consequences of failure, including ongoing access to overseas markets.
- Re 14 – it follows from comments at 13, industry will need to commit significant resources including funding to the items listed.
- Re 28 - how will the owner 'assess the level of risk' described in the Cattle health Declaration (CHD), particularly if they are a trader who buys without demanding CHDs for the cattle purchased? Presumably there would need to be an “unknown” option on CHD in this case.
- Re 34 Presence of JD- while this document is dealing with principles, general words that lack precision should be avoided when alternatives exist. The use of the word “presence” is an example. Presumably this section is meant to provide guidance to Government veterinary officers who will be required to provide property certification. Thus it is recommended that the World Organisation for Animal Health (OIE) definitions be used. Thus when an importing country requires certification and for example uses terms such as “free from clinical signs”, “free of Johne’s Disease”, “no clinical cases” and “no cases of : Paratuberculosis”, certifiers would be checking property records to see if a clinical case of JD has been recorded in the herd. It is recommended this section be revised as follows:
Clinical Johne’s disease
34
A clinical case of JD in a herd means that:
 - one or more animals showing slowly progressive wasting ± diarrhoea is identified and confirmed by definitive testing regardless of the strainA herd is infected with *M. paratuberculosis* if:
 - A clinical case of the JD is detected in a herd or
 - Infection with *M. paratuberculosis* is confirmed in an animal from the herd that may not be showing clinical signs of Johne’s disease

- Re 35- Strain of JD not relevant- NSW has previously raised concerns about the removal of the distinction between infecting strains. Again to provide clarity in meaning and to provide flexibility in the approach to on farm management of JD, NSW recommends this section be revised as follows:

Strain of JD

35

Distinctions between the infecting strain ('B', 'S' or 'C') are not relevant to the determination of a clinical case of JD.

The strain is relevant for the management of infection within a herd

- Re 42 - there are two clause 42s

Yours sincerely

A handwritten signature in black ink, appearing to be 'Barry Kay', with a large, sweeping flourish underneath.

Barry Kay
Acting Deputy Director General
Biosecurity and Food Safety

18 November 2015



BJD – WHERE TO FROM HERE?

A FRESH APPROACH TO THE MANAGEMENT OF JOHNE'S DISEASE IN CATTLE: MANAGEMENT PLAN FOR CATTLE PRODUCTION CONDITIONS

November 2015

**NSW Farmers' Association
Level 6 35 Chandos Street
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NSW Farmers' Association Background

The NSW Farmers' Association (the Association) is Australia's largest State farmer organisation representing the interests of its farmer members – ranging from broad acre, livestock, wool and grain producers, to more specialised producers in the horticulture, dairy, egg, poultry, pork, oyster and goat industries.

Executive Summary

In line with the submission to the second discussion paper, NSW Farmers' Association supports the general principles outlined in the JD Management Plan for cattle production, and welcomes the change to a risk-based, management focused approach.

While JD remains a notifiable disease, in a deregulated system it is crucial that the prevalence of the disease continues to be monitored. Processes need to remain robust enough to inform effective management practices of any reactor animals detected.

Informed management decisions are central to the deregulated approach. In the transition to the new system, farmers will need reliable and widely accepted tools at their disposal. The National Cattle Health Statement (CHS) will become integral to this system, as will assurance programs such as a CattleMAP and Dairy Assurance Score. Significant education and extension will be imperative to the new system, to equip producers with an understanding of their roles and responsibilities in managing and reducing JD nationally.

In general, the principles outlined in the document are in line with NSW Farmers' policy. This 'management plan' makes reference to the development of these principles into a more detailed document. Until such time as the comprehensive documents are produced, NSW Farmers reserves the right to make further comments on the detail of these principles. If the new management plan is to take effect in early 2016, these documents are urgently required so that beef producers and dairy farmers can understand the practical requirements of deregulation and producer-led management.

1. Management Plan for Cattle Production Conditions: Shifting the Thinking

The decision to classify JD as an endemic disease and approach it as an on-farm biosecurity risk is in line with NSW Farmers' Association policy. This is provided that it is supported by a management framework to assist producers in understanding their biosecurity duties, and results in a reduction in prevalence of the disease.

The two fundamental objectives of the Management Strategy for JD in cattle are articulated succinctly – the prevalence and impacts of JD must be reduced, and it will be the management decisions of the producers that will drive this. In deregulating the management system for JD, education of producers is crucial. As quarantine zones are removed and the management responsibilities are transitioned to be held solely by the producer, there is need for robust communication about the disease, the role and responsibilities of the producer and the available management tools. This communication should not only take place during the transitional phase, but should continue as a means to support producers in their ongoing efforts to reduce the disease.

The provision of funding will be critical to the successful transition to the new management system of JD. There will be initial and ongoing costs, and it would be beneficial for producers to understand where the 'intended funding' will be sourced from, and budgetary estimates provided for each area requiring funding.

Under section 14, the complete title of 'One Biosecurity' (the Beale Review) should be referenced for clarity.

2. Fundamentals of the New Approach: The Property, its PIC and the End of Zones

A property-based approach to JD will allow for cases to be more appropriately managed and assessed on an individual basis according to PIC. Where cases of JD are identified, producers will be able to respond appropriately, according to their management practices. The removal of quarantine zones reduces the stigma associated with JD, yet reinforces the importance of tools such as the MAP, Dairy Assurance Score and CHS to allow any purchaser of cattle to make an informed decision.

3. Fundamentals of the New Approach: Risk Assessment, Risk Management and Informed, Producer-led Decision-making

Instruments of risk assessment and management are integral under this Management Plan.

NSW Farmers supports the enhancement of the Cattle Health Statement (CHS), particularly to strengthen the producer's avenue to achieve legal recourse if false statements are made. In the deregulated system, it is necessary that producers who are

purchasing cattle have confidence in this document, and that it remains legally enforceable as a statutory declaration. It must be a trusted document, with all producers aware of the obligations and legal consequences. Simplification and inclusion of regulatory support for the CHS would greatly assist in this (as noted in section 29 of the plan).

NSW Farmers strongly supports the review of the CattleMAP. As noted in our previous submission to the second discussion paper, the proposed removal of zones will require the enhancement of assurance programs and tools as a means to assess risk when trading cattle.

If the CattleMAP is redesigned or a new assurance tool is developed, there should be a focus on providing a market-driven incentive for participation, and promotion of the benefits of participating in the program as well as purchasing from assured herds. It should also be developed to interact appropriately with the Dairy Assurance Score. It should be a system that encourages participation, and provides reasonable requirements for the attainment of each level of assurance.

Any move to a new or redesigned assurance system should allow for a transition period appropriate to the scale of change. Consideration should also be given for farmers currently involved in the CattleMAP, so that their status will not be lost in any transition to a new system, and they should benefit from ongoing perseverance to maintain their score.

4. Fundamentals of the New Approach: Dealing with JD Infection

This section of the Management Plan outlines significant changes to the national classification and management of JD in cattle.

As noted in NSW Farmers' submission to the second discussion paper, the removal of distinction between strains could still have serious consequences in NSW. More explanation on the rationale behind this decision would be beneficial, and if it is to be practically managed, other industries susceptible to JD would need to be involved in the discussion of JD management on a wider scale. Testing of JD should still indicate strain for management/control purposes, and there should be continual improvement of testing mechanisms to encourage producer utilisation.

While NSW Farmers supports the deregulation and removal of quarantine zones, given that JD remains a notifiable disease, traceability will still be important in the control of the disease. The management plan notes that trace back and trace forward will be 'strongly encouraged' but not mandatory under the new plan – more detail on how it will be encouraged needs to be articulated.

Conclusion

The JD Management Plan for cattle production sets out the preliminary structure for the new approach, but more details are needed. The move to deregulation is welcomed by NSW Farmers, but it must be adequately supported by education, extension and assessment instruments, to ensure producers are equipped to take over management of JD and reduce the impacts of the disease nationally.



NORTHERN TERRITORY CATTLEMEN'S ASSOCIATION INC.

Member - National Farmers' Federation & Cattle Council of Australia

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NTCA Response to the Animal Health Australia BJD Strategic Plan (2012 to 2020) Review

Email to bjdreview@animalhealthaustralia.com.au

These comments are in response to the following document: BJD- Where to from here, Version: 1.0 , DATED 31 October 2014

The cover of the Discussion Paper indicates that the target of the Framework Document is as follows:

BJD –WHERE TO FROM HERE

A FRESH APPROACH TO THE MANAGEMENT OF JOHNE'S DISEASE IN CATTLE: MANAGEMENT PLAN FOR CATTLE PRODUCTION CONDITIONS

KEY POINTS

1.1

NTCA has the strong view that one of the key goals in the current 2012 to 2020 BJD Strategic Plan should remain a Fundamental Objective in Paragraph 8 in any revised Framework – “support the protection of non-infected herds with a minimum disruption to trade”. This is a key objective for any biosecurity or disease management plan.

It is erroneous to focus only on the infected subpopulation of cattle. Paragraph 5 of the paper recognises that the disease is not known to exist in large areas of Australia such as Western Australia, Northern Territory and Queensland where over 60% of the Australian beef cattle herd reside. In addition there are large parts of western New South Wales and northern South Australia with a low risk BJD.

1.2

NTCA's view is that it is too simplistic to focus the Framework on the management of an endemic production disease by farmers with minimal regulatory and government input. While BJD is a listed OIE Disease, there will be an impact of the disease on many export cattle markets. The detection of or the presence of BJD on a property will prevent the sale of feeder, slaughter and breeder cattle to many south eastern Asian countries for a number of years. Over half of the Northern Territory cattle turnoff are traded to these export markets. There is a similar proportion of turnoff to the export markets from the Kimberley area of Western Australia and there is also an export cattle trade from northern Queensland.

1.3

BJD should be considered to be equivalent to an exotic disease to Western Australia and northern Australia. It is therefore an incorrect approach to assess options for managing BJD in northern Australia and in Western Australia similar to managing a production limiting endemic disease at the farm level. The principles of an incursion, establishment, management and consequences of an exotic disease are more appropriate.

There have been instances of imported infected cattle moving from the BJD endemic areas in south eastern Australia. There have been two known instances of BJD infected cattle moved to the Northern Territory where there was no evidence of spread of disease to local cattle. Infection was eradicated by testing and destocking. There was also the recent importation of bulls from a herd subsequently found to be infected. While no infected animals were detected in the NT, there was a major impediment and economic loss to the affected property. While northern



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Australia has climatic conditions not likely to be conducive to BJD, it is prudent to minimise the risk of introduction and establishment of BJD on a property due to the extremely high negative financial consequence of a failure.

The cattle industries and governments in Western Australia, Northern Australia and Queensland have the right to adopt reasonable protection measures on a risk assessment and risk management basis. It is likely that there would be a combination of a communication program, risk management by the owner and underpinning regulatory controls.

1.4

NTCA does support the abolition of Zones as active surveillance to establish and maintain zones is very difficult other than a history of lack of evidence of the disease by passive surveillance due to technical constraints of sensitivity and specificity of the current diagnostic tools. Despite this view measures identified in 1.3 to minimise the probability of an incursion of BJD into northern and Western Australia should be implemented.

1.5

NTCA supports the Framework Document to manage the endemic disease BJD where the cattle disease exists in south eastern and southern Australia as part of a farm biosecurity approach with BJD being one of the number of production limiting endemic diseases of cattle.

1.6

NTCA supports the retention of BJD as a notifiable disease. Failure to do so would create suspicions within our trading partners as BJD is an OIE listed disease.

OTHER COMMENTS ON THE DISCUSSION PAPER

2.1

Members were intrigued with "ensuring the presence of a biosecurity buffer between properties etc" in Paragraph 9. The typical rangelands fence would not seem to satisfy the biosecurity strategy.

Signed,

Tracey Hayes

Chief Executive Officer



18th of November 2015

National BJD Strategic Plan Review
Animal Health Australia
bjdreview@animalhealthaustralia.com.au

BJD – Where to from here?

To Whom It May Concern

Dear Sir/Madam

The Pastoralists and Graziers Association of WA (Inc) (PGA) is aware that Animal Health Australia is seeking responses to its Framework Document on its Management Plan for Cattle Production Systems.

The PGA is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

The PGA is not expert in the epidemiology of animal diseases and must be guided and trust the advice of experts in the field.

However, we make the following general comments on the document;

- ✓ Section 34 **Presence of JD** says that presence of JD in a herd means that infection with *M. paratuberculosis* is confirmed in an animal that may not be showing clinical signs.
The PGA understands that current methods of testing that do not rely on killing the suspected animal and culturing the disease in tissue samples may result in a *false positive* test.
As clinical signs of the disease in an animal are currently the definitive test, a more precise explanation of how this will work in practice is imperative.
- ✓ Section 35 **Strain of JD not relevant** notes that the historical distinction made by producers between the infecting strain ('B', 'S' or 'C') is not relevant to the determination of the presence of JD.
However, section 48 **Notifiability of JD in cattle** says that JD in cattle will remain a Notifiable disease.
In combination with 35 above, the PGA asks for clarification on the Notifiable status of cattle that have co-grazed with sheep that may later test positive for Ovine JD. Further, if the distinction between infecting

strains is not relevant will this also require a different approach to Ovine JD.

- ✓ There is some confusion over the capacity for cattle with S strain JD to be able to infect other cattle later. This should be more fully explored as part of Section 38 **Interpreting and understanding the results of JD tests and testing.**

Specifically, the PGA endorses the following sections of the document;

- 16 **Current SDR&Gs to apply until formally set aside** (by the Animal Health Committee).
- 17 **The property is at the heart of the new approach.**
- 21 **Freedom to trade.**
- 24 **Informed decision-making and risk management.**
- 37 **Understanding the nature and limitations of tests and testing.**

Yours Faithfully



Digby Stretch

Chairman PGA Livestock Committee

Comments on AHA document “BJD – WHERE TO FROM HERE?”

Overall comment

The document is largely acceptable and is in the main a fair reflection of the Reference Group discussions. The principles that it describes are, in general, sound and implementable.

Detailed comments

Page 5 – Biosecurity as the wider reference

The principle is well accepted. Any future approach must emphasise and practically implement a credible farm biosecurity system and **not** be a piecemeal, ‘disease by disease’ approach.

Page 6 – Funding

Abattoir monitoring for cattle is strongly supported. Money currently spent by AHA on BJD ‘management’ would be far better spent on abattoir surveillance. CVO SA would be willing to enter into discussion on how this might best be effected.

Page 7 – The concepts of zones and surveillance will be set aside

This paragraph contains a slightly misleading statement. The final sentence reads ‘Zones, protected areas and compartments will not be part of the new approach.’

In fact, the new approach to BJD management seeks precisely to establish a ‘safe compartment’ within which cattle can be safely traded with a minimum of risk.

In OIE parlance, a compartment is ‘an animal subpopulation contained in one or more establishments under a common biosecurity management system with a distinct health status with respect to a specific disease or specific diseases for which required surveillance, control and biosecurity measures have been applied.’

In other words, a compartment is a group of properties that may be widely scattered across a country but implementing similar biosecurity programs and striving to achieve similar disease levels in order that they may safely trade amongst themselves. They aren’t clustered to form a zone; their levels of assurance are based on their own management practices, and they endeavour to protect against a common biosecurity threat. That is a compartment. And this is exactly what we hope to achieve.

The sentence should therefore be amended to read, ‘Zones and protected areas will not be part of the new approach.’

Page 9 – Property and regional biosecurity plans

Property biosecurity plans should be standardised as a series of activities which can be checked off and for which evidence can easily be shown. The coverage of a biosecurity plan should be ‘scored’ by the number of activities undertaken against the total possible activities. This will indicate the level of biosecurity protection afforded on an individual property.

Page 11 – Presence of JD

This paragraph contains an anomaly that might, at worst, derail the new approach – or at best, be a serious distraction.

The definition given in this document of Johne’s disease is faulty. The document states:

The presence of JD in a herd means that:

- *A clinical case of the disease is identified and/or confirmed by definitive testing; OR*
- *Infection with M. paratuberculosis is confirmed in an animal that may not be showing clinical signs.*

This does not accord with the discussion in Canberra, nor does it line up with OIE principles. The OIE distinguishes clearly between *infection* and *disease*.

The OIE definitions are:

Disease - means the clinical or pathological manifestation of infection or infestation.

Infection - means the entry and development or multiplication of an infectious agent in the body of humans or animals.

Using the OIE standard, Johne's disease would be identified by a laboratory detection of the mycobacterium in the presence of clearly suggestive clinical signs.

Johne's or mycobacterial infection would be identified by a laboratory detection only in the absence of clinical disease. This is problematic because (a) the detection might be a misleading false positive and (b) lab tests often don't detect infection if it is present – therefore responding to 'laboratory positives' is a skewed response and doesn't allow for the realities of JD.

Epidemiologically, JD can be 'present' in a herd without causing any damage anyway and a detection may be of little significance. Clinical disease, however, is of paramount importance – finding and eliminating clinical disease through proper herd management reduces the likelihood of milk contamination and also facilitates live exports. We must not be distracted by detections of infection which would be of doubtful significance and lead us down the path of defining complicated herd statuses based on long series of expensive tests. We must be managing disease, not infection. Experience has shown that managing infection in the case of JD is not possible.

Defining disease as 'infection' is a dangerous misstep and is unacceptable.

The paragraph must be amended to read:

The presence of JD in a herd means that:

- *A clinical case of the disease is identified and/or confirmed by definitive testing.*

The laboratory detection of M. paratuberculosis var bovis does not constitute a detection of disease but should be declared by a producer when selling cattle where such a detection has been made.

In summary

South Australia supports a voluntary, deregulated approach to BJD but requires that this approach be broadened to a 'biosecurity only' approach. The current proposal still centres on JD and this must be altered as soon as possible.

The approach must be extremely simple and must be designed with the intention of attracting as broad a cross-section of producers as possible. The entire approach should be able to be fully described in six pages or less.

Roger Paskin – Chief Veterinary Officer - PIRSA



Queensland Dairyfarmers' Organisation Limited ABN: 90 090 629 066

Mr Duncan Rowland
Executive Manager Biosecurity
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DEAKIN ACT 2600
Email: bjdreview@animalhealthaustralia.com.au

18th November 2015

Dear Duncan,

RE: AHA Review of the National Bovine Johnes Disease (BJD) Strategy & Discussion Paper, 'BJD – Where to from here'

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 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.

The QDO welcomes the opportunity to provide further guidance to AHA on the review of the national BJD strategy and respond to AHA's latest discussion paper, 'BJD – Where to from here'.

The QDO notes that the AHA's proposed strategy principles is to incorporate the management of JD in an overall biosecurity framework for endemic cattle diseases. The QDO can understand that approach for State and areas where JD is endemic, but this does not apply to Queensland or Western Australia where JD is not endemic.

QDO has undertaken a survey of its members during August this year and within that survey the QDO asked if, farmers would support a lower level of legislative protection which could place their herd at a higher risk of Johnes Disease infection, to which 90 percent of respondents said NO, and secondly QDO asked farmers if the current Johnes Disease protected status for Queensland should be maintained, to which 96% of respondents said YES. The survey had a response rate of 51%. As such the QDO wants to maintain and if possible improve the level of protection for Queensland dairy farmer's herds from the risk of being infected with BJD.

The QDO is not aware of any other producer organisation, which has undertaken a survey of producers at the 'grass roots' level.

Primary Producers House, 183 North Quay, Brisbane. Postal Address: PO Box 13061, George Street, Q. 4003.
Telephone (07) 3236 2955, Facsimile (07) 3236 2956

With this feedback from Queensland dairy farmers, the QDO contends that there is a ‘ground swell’ of support for the current BJD management system as opposed to the claimed inverse which is reported by the AHA in the discussion paper but without any substantiation (reference paragraph 6).

As previously stated in our previous submission to the AHA, JD review, 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 also point out 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 incidence 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 between Northern NSW and South East Queensland 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, and when cross border movements resulted in a detection, quickly enacting biosecurity measures to quarantine and eradicate the source.

Given the clear evidence of the success of the current regulatory and dairy industry BJD program for Queensland dairy farmers the QDO and the majority of Queensland dairy farmers want to see the current system maintained.

In reviewing the Johnes Disease (JD) 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 and out of Western Australia compared to all other Australian States.

Over past years the Queensland Dairy Industry has worked co-operatively with producer’s, 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 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 QDO can discern any problems with the system has 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. The AHA proposal put forward seems to be the latter, which is an unacceptable outcome for QDO and Queensland dairy farmers.

The problem with the current AHA review process and proposal for changes to the current BJD management system 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 intense purposes and then at the same time asking individual farmers to carry all the risk of mitigating potential BJD exposure to their herd.

As we have seen in Victoria and NSW, even with the Dairy Industry BJD management program, the prevalence of BJD has spread. Whereas, in Queensland and Western Australia, the current cross border cattle movement restrictions combined with the Dairy Industry BJD management program has enabled the Queensland dairy industry to keep BJD incursions at a low level and the ability to eradicate them if they occur.

To withdraw the current BJD system would expose our farmers to an increased risk of exposure to BJD, which if infected would cause direct financial, productivity and management impacts to those farmers. To place additional financial and management pressure on Queensland dairy farmers, particularly in the current extremely difficult trading environment would be a retrograde step.

In the paper, produced by Animal Health Australia, ‘BJD – Where to from here?’ A Fresh Approach to the Management of Johnes’s Disease in Cattle: Management Plan for Cattle Production Conditions, produced from the Reference Group meeting held in September, the QDO notes that;

- The paper acknowledges that ‘is endemic in some cattle production areas of Australia but in other areas the disease is not known to exist (or exists at a low to very low level)’ and that
- ‘The principles of the new approach is to incorporate the management of JD in an overall biosecurity framework for endemic cattle diseases’

The QDO points out that Johnes disease is not endemic in Queensland or Western Australia and should not be treated as such. Through seeking to apply a new national BJD program based on the assumption that all regions of Australia are endemic with BJD means that Queensland and Western Australian Government’s may move to a lower level of protection and thereby exposing their farmer’s herds to a much higher risk of BJD exposure and for that disease overtime to become endemic in Queensland and Western Australian as has occurred in other States where they have only relied on farm based BJD management systems and honesty.

The QDO also notes that the AHA report states that, “The objectives of the recast Management Strategy for JD in cattle are to: Manage and reduce the impact of clinical Johnes’s disease; “, however the QDO believes that the proposed deregulation of the current BJD management program by industry and potentially State Governments would lead to an increase in the incidence and impact of BJD for dairy and beef producers in both Queensland and Western Australia.

As previously stated there exists a clear contrast between BJD occurrence between South East Queensland where there have only been very few detections of BJD, all being from imported cattle, and Northern New South Wales where BJD is now common amongst dairy herds.

The stark level of difference of BJD presence between the two regions is largely due to the combined approach of cross border movement restrictions combined with the Dairy BJD management scheme. Decoupling the existing proven successful BJD risk mitigation scheme will place Queensland dairy farmers in a similar risk situation as dairy farmers on Northern NSW which have not managed to stop the spread of disease from one herd to another within that region.

For an industry and or Government to agree to withdraw a successful BJD management system and place individual farmers at a greater risk of disease exposure we believe it would be a failure of their duty of care to the farmers concerned and their cattle.

Equally the QDO disagrees with the claim that deregulating the current BJD scheme would “*improve the biosecurity credentials of Australia’s cattle industry*”, if it increases the risk of BJD exposure to current non infected regions of Australia’s cattle industry, particularly when stakeholders in the non-infected regions are currently developing live cattle export markets. In addition the QDO disagrees that the proposed deregulation of the current BJD management system would “ensure the presence of a biosecurity buffer between properties to minimise the spread of endemic and exotic diseases should one occur”, when in fact the contrary would occur if the Queensland and Western Australian Government remove their respective cross border BJD restrictions. Equally the QDO disagrees with the claim that the new proposal would lead to ‘reduce prevalence of BJD disease in Queensland or to ‘lower costs’ for producers.

The QDO disagrees with the claim by AHA that the new proposal, “takes the business interests of producers as its cornerstone. It places in their hands the assessment and the management of opportunities and risks associated with the pursuit of these interests.” The QDO believes that the business interests of Queensland and Western Australian dairy farmers and beef producers would be, not to be exposed to the risk of being infected with BJD in the first instance. The current combined Government and industry BJD management system has been very successful in protecting Queensland dairy farmers and as such the QDO sees it as the best business interest for our industry is to maintain and strengthen the current system, not dismantle it.

The QDO contends that transferring all risk to the individual farmer will also transfer all costs of managing BJD risks to the farmer and combined for Queensland dairy farmers will be a greater cost than maintaining and strengthening the current BJD management system.

The QDO believes that the AHA’s proposal to transfer all risk to the buyer, ‘*whose interests are protected by Common Law*’, is naive in the extreme and will leave individual farmers to take legal action against sellers if they are sold cattle infected with BJD which may or may not have been declared incorrectly or identified some years into the future. This approach fundamentally disregards the insidious nature of BJD and the difficulty of detecting its presence in animals until they mature mid age animals. This reckless disregard for the nature of BJD will enable it to spread further as has occurred in regions where there has not been movement restrictions, leading the BJD being endemic in those regions.

The QDO disagrees with the proposed approach presented by AHA as some producers which become infected under such a proposed scheme may not be impelled to do anything about the presence of the infection but in so doing becomes a constant risk for other producers in that region which do not want the disease on their properties. This then raises the issue of common livestock management facilities such as saleyards etc which can leave non infected farmers at the risk of infection once properties within a region become infected but do not seek to eradicate the source of the infection.

As the AHA proposes under a new scheme there are no quarantine orders or movement restrictions, innocent farmers are at risk of their properties becoming infected if a seller or agent does not correctly declare the health status of animals, of which the buyer may not discover for five or more years, and be left with the only course of action of taking '*Common Law*' legal action against another farmer. The situation could be even more difficult in relation to clearing sales whereby the entity selling the cattle may not exist following a sale.

With the proposal by AHA of no quarantine requirements and therefore no compensation requirements for affected producers or regulated movement restrictions the QDO contends that some producers which properties become infected with BJD will not do the right thing by other producers and sell infected animals without disclosure or equally not discover the infection for some years by which time a producer could of on sold many infected animals exposing other farms. The lack of compensation and threat of a class action could encourage some producers to find ways to avoid liability to affected farmers.

The proposal by AHA re 'Disclosure of JD status is recommended but not mandatory unless the purchaser requests the information.', only serves the interests of the seller and detracts from the objective of seeking to reduce the risk of the spread of BJD, whilst leaving a buyer carrying all the risk of a disease which may not be detectable for a number of years, by which time animals on their farm could have been cross infected as well as infecting the farm. Again this proposal the QDO believes fails the duty of care test for industry and Government policy.

The AHA's proposed approach of leaving a buyer to take all of the risk in relation to BJD does not provide the best approach for preventing the spread of the disease, as once a buyer has unknowingly purchased an infected animal and introduced it to their herd and combined with the fact that the infected animal may not present clinical symptoms of infection for some years by which time many animals in a herd could be cross infected – is an approach of too little too late.

The QDO is extremely doubtful if any practicing veterinarians would be willing to sign certificates verifying the BJD free status of herd, given the insidious nature of the disease. Equally the QDO believes it is naïve of AHA not to place declaration obligations on cattle trading agents, which have been identified as a risk vector in the current system.

The AHA's proposal that, "When JD is found in a herd and while industry protocols and good business practice may encourage trace-forwards and trace-backs, the decision to do so rests with the producer of a JD affected property. Tracing will be strongly encouraged." again leaves the buyer carrying all the risk and without support the QDO believes many farmers which unfortunately end up purchasing an infected animal/s and unknowingly selling infected animals from their property, will not undertake trace-forwards or back-wards. Without this tracing process there will be even less prospect of being able to manage the spread of BJD and for free areas such as Queensland and Western Australia the lack of trace-forwards or back-wards requirements would lead to a higher risk of BJD incursion and spread within those regions.

The QDO believes that the AHA proposal to rely on disease notification is flawed, as it relies on a farmer firstly testing for a disease and then making a notification. Equally it is not clear in the AHA proposal if a buyer could access the notification system to independently check the status of a seller.

In Queensland the details of biosecurity obligations of farmers is still to be set out under the new Biosecurity Act.

The QDO does not think it is fair to producers to ask them to agree to a process which they have not yet been given the details of, particularly when it involves them potentially accepting higher levels of liability risk.

In Queensland a huge amount of effort and expense has been invested over many years to keep JD out of the Queensland Dairy Industry. There have been a number of studies which clearly demonstrate that JD can have considerable impacts on dairy farms.

The QDO holds very real concerns about implications for trade and the QDO's efforts to develop new live export markets for dairy cattle, as many nations have restriction pertaining to Johnes Disease. The deregulation of the current BJD management scheme and in particular Government regulatory cattle movement restrictions could have trade implications.

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. 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. As this issue now does not seem to be part of the consideration of the latest AHA proposal, then the outcomes of this whole review runs the risk of leaving the Australian cattle industry and in particular those industries in Queensland and Western Australia carrying a much larger risk than it needs to be.

The QDO agrees that there needs to be a greater understanding of the disease and a greater ability to test for the disease in an accurate and time efficient manner. This is essential for any management program to be successful. As such the QDO believes more research is required to be carried out both in detecting, limiting and managing the disease.

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

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 previously applied.

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 JD at a very low level.

The QDO believes that AHA's proposal to implement such large proposed changes to the current BJD system nationally and have it 'ready for implementation in early 2016', a matter of three months away and over the Christmas season, is again extremely naïve, particularly when much of the details and obligations of the proposed changes are yet to be developed, tested or agreed too.

The QDO believes that the current system can be improved with;

- the creation of an industry support fund to support producers, whom unfortunately end up with BJD infection in their herd, to eradicate the disease from their herd. As stated previously the limited incidences of BJD incursions in Queensland have occurred with the importation of infected animals,
- providing some flexibility for cattle movement for herds that incurred infections, through allowing farmers to sell infected animals interstate where BJD is endemic and the buyer is comfortable to purchase the animal/s in full knowledge of it carrying BJD. Producers with infected animals should still be encouraged in the first instance to send infected animals to slaughter,
- implementing an improved industry surveillance program, funded by industry, to use herd mature testing techniques to check the BJD status of herds in the first year of the new program to establish a new industry BJD status baseline,
- to carry out surveillance checks annually on herds for a number of years and then if no detections occur in a herd lessen the frequency of surveillance checks, unless introduced animals have come into the their herd from interstate or from a Queensland herd which has had a recent detection,
- including a BJD management module within dairy farmers Quality Assurance programs as part of a farms biosecurity plan,
- reviewing the national dairy BJD management program accordingly to encompass new processes.
- If BJD zones are no longer recognised nationally, Queensland should then be registered as a 'Recognised Biosecurity Area' and for that recognition to be linked to the Queensland Biosecurity Act and regulations.
- The QDO wholly agrees that any changes to the current BJD management system will require an effective education and service support program to help producers to fully understand the requirements of a new system and to be able to implement it into their farm management plans.

Yours faithfully,

Brian Tessmann
President
Queensland Dairyfarmers' Organisation Ltd

(to be read in conjunction with John Gunthorpe's submission)

I would add to your excellent response John

WA claim to be free of BJD when JD endemic in sheep and no attempt to keep cattle separate from sheep is technically and ethically fraudulent and national program must make it clear that such a claim is impossible

Point 41 – Commercial impact of JD manifesting on a property will vary

The impact of bjd variesnot on 95 to 99% of herds where there is no or negligible impact (1 or less clinical cases every 5 years)

90%+ of beef herds in SE Australia have detectable infection

- of those that have detectable infection
- less than 6% have more than one clinical case over last 5 years a
- over 50% have no clinical cases in the previous 5 years and still eligible to enter most overseas country including Indonesia as long as no state bureaucracy imposes movement restrictions

I note ineligibility to export to Indonesia that cost Northern producers who had purchased Rockley bulls many millions of \$ none had ever had a clinical case so still eligible to enter Indonesia but not eligible to export because subject to quarantine

Regards, David

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19 November 2015

Animal Health Australia
PO Box 5116
BRADDON, ACT 2612

RE: BJD – Where to from here? A fresh Approach to the Management of Johne’s Disease in Cattle: Management Plan for Cattle Production Conditions

We write to provide the joint submission on behalf of the Sheepmeat Council of Australia (SCA) and WoolProducers Australia (WPA) on the above review currently being conducted by Anima Health Australia (AHA). SCA and WPA are the national Peak Industry Councils representing and promoting the needs of Australia’s lamb, sheep meat and wool producers.

SCA and WPA welcome the opportunity to contribute to this consultation process, recognising the importance of the BJD Review process in ensuring the continued success of endemic disease management within both the cattle and sheep industries of Australia. SCA and WPA strongly believe that the management of JD, regardless of the strain, should be considered in the broader context of managing endemic disease holistically throughout Australia using strong biosecurity practices.

Further to this, given the synergies between the cattle and sheep industry JD and endemic disease management projects, SCA and WPA urge this review to consider opportunities for the two industries to leverage off one and other, ensuring producer levies are expended in an efficient and effective manner.

Please find attached our submission providing SCA and WPA comments on the recommendations provided in the second discussion paper.

Yours sincerely,

Jeff Murray
President
Sheepmeat Council of Australia

Richard Halliday
President
WoolProducers Australia

BACKGROUND - SHEEPMEAT COUNCIL OF AUSTRALIA and WOOLPRODUCERS AUSTRALIA

Sheepmeat Council of Australia

SCA is the national Peak Industry Council representing and promoting the needs of Australia's lamb and sheepmeat producers.

The objects of SCA are;

- to represent and promote the interests of Australian sheepmeat producers
- to carry out activities necessary for the advancement of the sheepmeat and live sheep export industries;
- to collect and disseminate information concerning the sheepmeat and live sheep export industries;
- to co-operate with industry stakeholders and organisations at the state, national and international levels;
- to maintain interaction and co-operation with its Members, relevant Government departments and authorities at Federal, State, and local government levels, and with other relevant industry organisations;
- to promote the development and resourcing of the agricultural and pastoral industries of Australia;
- to act as the Prescribed Body for the sheepmeat industry in Australia within the Red Meat Industry Memorandum of Understanding (MoU) under the Australian Meat and Livestock Act 1997 (the Act).

SCA represents sheepmeat producers in Australia and provides a mechanism to bring a diverse range of issues and needs to the policy making process. The Council draws on many formal and informal processes to achieve this. Principal amongst these is input from the state farming organisations, which have extensive networks within their jurisdictions.

As the recognised peak body for the sheepmeat industry under the Act, SCA sets the strategic objectives to be pursued by the levy funded organisations Meat & Livestock Australia (MLA), Animal Health Australia (AHA), and the National Residue Survey (NRS), examining and approving their programs and budgets. We are involved in priority setting for industry R&D and marketing activities both domestically and internationally as set out in the Red Meat MoU. Under the MoU SCA assesses the performance of services delivered by expenditure of lamb and mutton levies.

WoolProducers Australia

WoolProducers Australia is the national Peak Industry Body (PIB) representing and promoting the needs of Australia's wool growers. Our membership covers the industry's commercial, superfine and stud breeding sectors.

WoolProducers is nationally representative through our State Farming Organisation (SFO) members and three democratically elected Independent Directors. Through the engagement of Independent Directors, WoolProducers is able to ascertain the needs of growers both within, and external to the SFO system. This sets WoolProducers apart from other wool grower representative groups and gives it the mantle of the only true democratic and representative voice of the Australian wool industry.

WoolProducers work also includes the provision of advice to AHA, State and Federal Governments on behalf of the wool industry on a day to day basis through representation on national animal health and welfare committees.

As the only wool grower organisation with membership of the National Farmers' Federation, WoolProducers is responsible for providing key policy advice on behalf of our members, and other wool growers, to Australia's peak farm body.

WoolProducers also works closely with the Federal Department of Agriculture on key issues such as animal health and welfare, biosecurity, pest management control, natural resource management, drought preparedness, emergency animal disease outbreak preparedness and industry development, including research and trade.

Response to BJD – Where to from here? A fresh Approach to the Management Johne’s Disease in Cattle: Management Plan for Cattle Production Conditions

The Sheepmeat Council (SCA) of Australia and WoolProducers Australia (WPA) welcome the opportunity to respond to the framework document prepared in response to the National Bovine Johne’s disease review. Whilst this framework has been prepared by AHA on behalf of the Australian cattle industry, many of the issues considered also reflect those faced by the Australian sheep industry. As such, SCA and WPA would urge that the recommendations made by this review are considered, where possible, in line with the policy and management of OJD and other sheep industry production conditions.

Background – Ovine Johne’s Disease

OJD is an incurable and infectious wasting disease of sheep caused by the sheep strain of bacterium *Mycobacterium paratuberculosis*, which leads to the thickening of the intestinal wall and reduced absorption of nutrients, resulting in loss of condition and death in the infected animal. Bacteria are spread through the manure of infected sheep, contaminating pasture and water supplies to infect other sheep within the flock. Once a flock becomes infected with OJD it is difficult to eradicate, however due to the availability of the Gudair vaccine OJD can be successfully managed to reduce production losses. Left untreated, OJD can result in serious economic losses due lost production of both meat and wool sheep flocks.

Since the early 1990’s, OJD has been recognised by the sheep industries as a disease that can result in significant production losses. As a result, the following management plans were established to assist producers and government in managing the disease:

- National Ovine Johne’s Disease Control and Evaluation Program (NOJDP) 1998-2004
- National Approach to the Management of Ovine Johne’s Disease in Australia (NAOJD) 2004-2007
- National Ovine Johnes Disease (OJD) Management Plan 2007-2012
- National Ovine Johnes Disease (OJD) Management Plan 2013-2018

The current OJD management plan, the National Ovine Johnes Disease (OJD) Management Plan 2013-2018, was based on a revision of previous plans through extensive consultation with producers, industry and state governments, taking effect from 1 July 2013. The plan was developed to enable producers to take a risk-management approach to their farm biosecurity, notably encouraging the use of the Sheep Health Statement and Regional Biosecurity Plans (RBPs). The objectives of the plan are as follows:

- To minimise the risk of infection by the bacteria spreading to properties and regions that currently appear to be disease free.
- To reduce the financial impact and adverse animal health and welfare effects of the disease on individual flocks, and on the sheep industry as a whole.

The plan provides a Framework for states to work from in setting their OJD policies, and does not interfere with trade. Further information on the National Ovine Johnes Disease (OJD) Management Plan 2013-2018 can be found at www.ojd.com.au.

Response to BJD – Where to from here? A fresh Approach to the Management of Johne’s Disease in Cattle: Management Plan for Cattle Production Conditions Recommendations.

There are many parallels between the proposed BJD National Management Plan outlined in the framework document and the current OJD National Management Plan. These include, but are not limited to; the treatment of BJD as an endemic disease operating under a ‘management’ plan rather than control and eradication plan and a strong focus on producer responsibility through producer biosecurity practices and awareness.

Whilst these similarities exist, there are also a number of differences, including, but are not limited to; no distinction is made between different strains (sheep (S); cattle (C) and Bison (B)) when confirming JD infection in a cattle herd, the removal of the need to declare JD status under BJD Management plan, and, proposed total deregulation by state jurisdictions.

In considering the cattle industries approach to the management of JD, and more broadly endemic disease and production conditions management, outlined in the framework document, SCA and WPA raise the following three issues:

1. Current evidence indicates, as noted in the proposed framework, that Cattle (C), Bison (B), and Sheep (S) Strains of Mptb have the ability to infect a variety of species, including cattle and sheep. Given many Australian production systems are geared toward co-grazing, there is a clear need for impacted industries to collaborate and cooperate, where possible, to ensure practical outcomes from producers. This may include, but is not limited to, the review and refinement of tools, including sheep/ cattle health statements, market assurance programs (MAPs) and Regional Biosecurity Plans (RBPs), across impacted industries.
2. Under the proposed BJD Framework, State jurisdictions have agreed to the total deregulation of JD. In line with point 1 above, given cross strain infection and co-grazing production methods, there is a need to ensure that all jurisdictional legislation is harmonised across all species affected by JD.
3. Further Research and Development (R&D) into the implications of strain diversity, vaccination and diagnostics tests is required.

Response to the four sections included in the framework document.

1. Management Plan for Cattle Production Conditions: Shifting the Thinking

SCA and WPA support the principles outlined in this section of the framework document.

JD management should be aligned with other endemic disease and production condition management, and should be considered in the broader context of encouraging strong producer biosecurity awareness and practices.

The recently released MLA report *Priority List of Endemic Diseases (B.AHE.0010)* supports the approach to deescalate the treatment of JD in line with other endemic diseases that often have ‘greater consequences’ for industry.

The sheep industry has already commenced projects, managed through service providers such as AHA, that that adhere to these principles.

2. Fundamentals of the New Approach: The Property, It's PIC and the End of Zones

SCA and WPA support the principles outlined in this section of the framework document.

SCA and WPA supports the recommendation that zone constructs are removed and replaced with a risk-based management systems underpinned by strong biosecurity practices. However, as noted on page 5 under issues 1 and 2, the removal of zoning, both at a regional and State level, will require the harmonisation of State legislation and risk management tools across **all** species to ensure a simple and robust management system for producers.

3. Fundamentals of the New Approach: Risk Assessment, Risk Management and Informed, Producer-led Decision Making

SCA and WPA support the principles outlined in this section of the framework document.

SCA and WPA acknowledge that the beef and dairy industries have differing industry and market requirements, which is echoed across the sheep meat and wool industries. However, as noted on page 5 under issues 1 and 2, the move to deregulated, risk based management in a production system that commonly includes co-grazing of JD prone species, will require the joint review of supporting risk management tools to ensure practical solutions for producers.

SCA and WPA agree that these tools include, but are not limited to, the sheep and cattle health statement (SHS/ CHS), Market Assurance Programs (SheepMAP, CattleMAP) and Regional Biosecurity Plans. Not only would these tools need to be reconfigured to work across different species, they would also need to take a much stronger biosecurity focus, rather than just JD.

SCA and WPA would therefore request that the review of current management tools, including those listed above, are done in conjunction with other impacted industries to ensure that the programs leverage off one and other, and producers are provided with programs that can reach across a number of species that they may farm.

4. Fundamentals of the New Approach: Dealing with JD Infection

SCA and WPA support the principles outlined in this section of the framework document.

SCA and WPA recommend that there is a requirement for JD R&D to focus on the following:

1. Further research into the implications of strain diversity across species
2. Improved development and delivery of JD diagnostic tests
3. Continued work into JD vaccinations

In direct response to paragraph 46, whilst JD pathways and plans remain industry and species specific, there is significant need for collaboration and cooperation across these industries and species to ensure the best outcomes for producers.

Submission to draft BJD framework document from

UNITED BEEF BREEDERS ASSOC of WA inc

UBBA finds much to be agreed to by this document e.g. removal of quarantine and trying to de-stigmatize BJD but has some comments we wish to make on several clauses. UBBA represents the WA seedstock industry and so far has had over 300 contacts supporting the status Quo for WA.

Clause numbers

6 Need for a different approach

We agree the existing strategic plan is not appropriate where BJD is endemic but has been very effective in disease control where BJD can be considered “exotic” eg. WA and NT

8 fundamental objectives

Refers to tools to “manage spread” of BJD – WA industry does not accept inevitability of spread to our area and regards existing import regulations to WA as providing adequate prevention of infection and for control of any suspect outbreaks

10 Bio-security as the wider reference

We agree for need for better bio-security awareness but argue that current tools are not sufficient where a disease is “exotic” as BJD is in WA.

13,14 Education funding

Considerable funding for education relating to bio-security uptake by producers will be needed to enable “informed decision making” (see 24). Where are these funds to come from as state depts. have reduced budgets?

18 Zones set aside.

Does not fit entirely with clause 30. We would argue that cost-effective surveillance CAN be achieved where BJD is “exotic” eg. WA

20 Shared status____
and

21 Freedom to trade

Both allow for regions , even states, to make their own rules/regulations to collectively manage the risk of infection so we support them

29 Upgrade CHS’s

Agree with all. Question who and how “regulatory support” is funded.

30 Freedom to design tools

Agree as “groups” could be extended to” state” as for WA.

31 RBP’s

Agree as could extend RBP's to cover whole state. Plans will enable exactly what WA industry wants to i.e.—“control and manage diseases to minimise” or better stop “ spread of endemic conditions”

32 Replace CattleMAP

“Owned and operated by industry” –how is that envisaged , who pays and at what cost?

34 Presence of BJD

Okay with first dot point but second may have unintended results. How does this cover properties that co-graze cattle and sheep if the sheep have OJD and how will this effect export protocols for cattle since sheep OJD is deregulated in most states?

42 two clause 42's

48 Notifiability of BJD in cattle

“investigation may be undertaken” – at odds with concept of deregulation and only needed for record keeping.

Earlier document clauses 51 & 52

Related to confidentiality of records have been removed but we would have thought important to be included.

Appendix C

We would argue these points critical for success and acceptance of the new policy.

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David Lovelock

President UBBA of WA

WA STATE COMMITTEE
Angus Society of Australia
P O Box 135, Claremont WA6910

18th November 2015

To Animal Health Australia

Submission:

BJD – WHERE TO FROM HERE?

Overall, this document clearly sets out a plan for the ‘Fresh approach to the management of Johne’s Disease in cattle’, but it has very little detail and almost no timelines. While paragraphs 15 and 33 give some assurance that the existing BJD SDR&Gs as well as the current CattleMAP requirements remain in place until this approach is finalised, the document raises more questions than concrete information.

The WA Angus Committee, after discussion at their meeting on 12th October 2015, as well as the vast majority of the 70+ producers who attended the BJD Review Forum in Perth on 11th August 2015, is strongly in favour of the retention of the BJD Free Zone status for Western Australia, perhaps in conjunction with a widespread but targeted testing process undertaken over the next twelve months to confirm that status before any new approach is implemented.

Members welcome the content of dot point 6, paragraph 9 which states “seek improvements in diagnostic tests, vaccines and management practices that will provide economic benefit to producers having to manage these diseases.” It is hoped that for BJD the improvements will include a reliable test on (especially young) live individual animals as that is essential in managing this disease and reducing the incidence of it before it becomes endemic in WA.

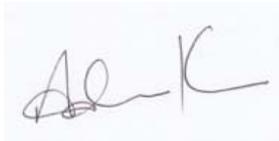
In paragraph 6, the document states that “The review identified that there was a groundswell of support for JD to be dealt with differently from the way in which it has been over the past twelve years.” It does not say which area of Australia that groundswell came from but it would not have been from WA as the BJD Free Zone status is extremely important to our producers, especially the export section of the industry.

Widespread testing twelve years ago established that status; intermittent tests on possibly suspect animals/hers resulted in those properties being cleared. WA's BJD Free Zone status must remain especially as the third dot point in Appendix C states "ensure that parties transition to the new program without disadvantage". Removal of the current BJD Free Zone would significantly disadvantage WA.

As the document says in paragraph 6, this is a substantial shift in thinking requiring no state (or territory) regulation to manage endemic diseases such as BJD. This 'substantial shift' gives total responsibility for managing endemic diseases to the producers at their cost, though paragraph 48 states that JD in cattle remains a notifiable disease without any action (other than keeping the record) by relevant governments.

While the 'buyer beware' concept is valid, the document accepts that producers will require the tools for assessment, risk management and decision support mentioned in paragraphs 13, 14, 25, 26, 27, 28 and 29. The document gives no indication of when these tools would be available but a phone call to Animal Health Australia clarified that these tools will be prepared after the final decisions are made about the form the new approach will take.

Members again strongly feel that no changes should be made in the current zones and restrictions on cattle movements until testing in WA is undertaken to confirm or deny the current BJD Free Zone status of our state.

A handwritten signature in black ink, appearing to read 'A K', is centered on a light blue rectangular background.

Andrew Kuss, chairman WA Angus Committee
P O Box 196, Esperance WA 6450
Ph 08 9076 1240 Email andrew.kuss@bigpond.com

Submission

BJD – Where to from here

To:
BJD Review Panel
Animal Health Australia

November 2015

Prepared by WAFarmers Federation

Contact: Kim Haywood

Executive Officer - Policy

Tel: (08) 9486 2100 **Email:** kimhaywood@wafarmers.org.au **Website:** www.wafarmers.org.au

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 the latest discussion paper on a fresh approach to the management of Johnes disease in cattle.

Introduction

The WAFarmers Federation is in a position to support the proposed 'fundamental objectives' as stated in paragraph 8 of the paper, on the basis that the objectives for the new BJD framework and management strategy have primarily been developed to assist those cattle producers in the states of Australia where BJD is endemic. Clearly, the objectives of the recast strategy do not apply to Western Australia where BJD is not present as an endemic disease.

The 'principles' of the new approach as stated in paragraph 9, to incorporate the management of Johnes disease in an overall biosecurity framework is welcome, and it allows Western Australia to be identified as a 'Recognised Biosecurity Area/Group' (RBG) with immediate effect. Particularly, given WA's well-established and maintained area Freedom Status, which has been in place and adhered to, by domestic and international traders and officials alike, for many years?

Discussion

Western Australia's defences against the incursion of unwanted diseases, especially those that may have a causative link to a public health disease, were strengthened with the introduction of the Biosecurity and Agriculture Management Act 2007 (BAM Act), which came into effect in May 2013.

The establishment of an RBG, as mentioned above, complements the aspirations of the Cattle Industry Funding Schemes (IFS) designed to combat animal diseases that adversely affect the profitability of livestock businesses. WA's cattle industry funding contributions provide the necessary funding needed to maintain and support the surveillance requirements for future BJD controls in Western Australia.

The BAM Act also provided the foundation for updating the Department of Agriculture and Food, WA (DAFWA) pre and post border biosecurity policies, procedures and systems. The DAFWA website contains information on how to apply for a cattle import permit.

WAFarmers understands and accepts that a new framework strategy for the management of BJD is needed in the eastern states where BJD is endemic and there have been issues with the administration

of the plan. However, the situation in Western Australia is very different to that of the East. The overall objective for Western Australia's cattle producers is to protect their herds from BJD infection. Consequently, Western Australian cattle producers have agreed to maintain its current prevalence status and protect its cattle herd (dairy and beef) long term from Bovine Johnes disease.

Over the next couple of months, WAFarmers and others will work with DAFWA and AHA to complete risk modelling and cost benefit analysis' to ascertain appropriate testing protocols applicable to different categories of cattle before they move into Western Australia. Once these protocols are established they will be communicated widely for action and verification by sellers and/or interstate owners, before animals will be permitted to move into WA.

WAFarmers fully supports further investment into the development of new diagnostic tools for Johnes disease and the re-establishment of certification labs and official approval processes to speed track new diagnostic tests to assist the control and management of the disease on-farm.

WAFarmers further welcomes the suggested funding available under the new plan that will be needed to support Western Australia's communication campaign describing the mandatory testing requirements for different categories of cattle destined to be imported into WA in 2016 and beyond.

As mentioned twice previously, WAFarmers will not support changes to the SDR&Gs until further research is completed on the implications of disease spread and the impacts of different Johnes disease strains on different species.

WAFarmers would like to point out that agreement on the removal of the current zoning criterion and the adoption of a property centric marketing model has not been achieved nationally, as it is not applicable to Western Australia.

The negative implications of the property centric model concept on WA cattle business are not practical or cost effective. It will result in significant cost increases to individual cattle business forced to test individual animals or herds to prove herd freedom, which is not required at present because that State has 'Area Freedom'.

Secondly, the cost and inconvenience of new and additional management practices, like the three step calf plan and alternative grazing requirements for animals less than 12 months, which are not practiced or needed in WA because the disease is not endemic in WA and the industry wants to keep it this way.

In reference to paragraph 21 – Freedom to Trade – WAFarmers would put the following question to the BJD Review Panel for consideration. How do you prosecute a seller who sells animals that later are found to be positive for Johnes disease? The paper naively states: *It is the responsibility of the seller to provide the herd-health information sought by the buyer, whose interests are protected by Common Law*'. We are aware of attempts to take sellers to court under these conditions; none have succeeded because it is near impossible to prove a seller has 'knowingly' sold an infected animal. We also believe that it would be most difficult for a vet to sign a certificate or declaration claiming an animal did not have Johnes disease.

Cattle owners make business decisions based on their individual production ambitions. They may not necessarily consider the unintended consequences their actions may have on their neighbours and/or

region in terms of disease implications, particularly for an unknown disease such as BJD is in WA. For this reason alone, the property centric model is not appropriate for WA, as adoption of this model over a short period of time could result in an increase in the disease in a relatively short period of time, leading to the loss of important trade markets and the consequential loss of business income.

We also note in paragraph 42 - *Disclosure of JD status is recommended but not mandatory unless the purchaser requests the information.* As noted above, BJD is not present in Western Australia, therefore it is not at the forefront of a purchaser's mind when purchasing an animal and hence the request for information will not be forthcoming. It is only after the disease is identified on the buyer's property does the full extent of this error become apparent. This is exactly the type of situation Western Australia wants to avoid.

If we reflect on the outcomes that have occurred in WA since the removal of another national disease program aimed at the management of a different endemic disease, which was rescinded in favour of a property centric model, the State has witnessed a considerable increase in the prevalence of the disease across an increasing number of properties.

Paragraph 24 states – *'Risk is best managed through informed decision making:* This is a good philosophy in principle but not always practiced in terms of disease management and biosecurity, especially when dealing with an unknown disease, in the safe and generally disease free Australian cattle industry. The cattle health statements are rarely used in Western Australia. Past experience indicates the uptake of active biosecurity plans on a property basis is extremely low at present and will take a considerable effort supported by funding across the board to drive progress on uptake.

WAFarmers will welcome the opportunity to consult on the refinement of the market assurance programs when these are ready for circulation.

WAFarmers seeks further clarification on the verification process and approvals documentation that will be required to provide assurances to WA cattle buyers purchasing cattle from other states where BJD is endemic or present.

In Conclusion

The main priority for Western Australia is the 'protection of its cattle herd' from BJD infection. The industry believes the benefits of this policy far outweigh the suggestion to deregulate the controls and management of BJD in WA, at present. This is particularly important given the significance of the export market to the WA livestock industry and the need to maintain market access to a range of existing and new countries. A Risk Management Framework looking at movement pathways from different regions will be agreed, communicated and actioned during 2016.

WAFarmers believe the main advantages for beef and dairy producers in Western Australia of maintaining a BJD Free Area include:

- a. There will not be a need for individual herd testing or the costs associated with accreditation schemes for any cattle enterprise in WA.
- b. Continued assurances to supply domestic and international markets.
- c. The maintenance of effective and well respected border controls and strict entry conditions and biosecurity protocols underpinned by the BAM Act.

- d. Significant marketing advantages especially if a causative link is identified to public health issues.
- e. The new BJD framework management approach, if adopted by others in the eastern state, will allow more commercial and pedigree animals to move into WA, if owners/managers provide robust evidence of herd and individual testing prior to the movement of sale animals into WA.
- f. The existing cattle IFS funding contribution and the CICA fund adequately covers the surveillance and testing requirements to maintain WA's RBG status.
- g. Existing movement border control facilities, processes and documentation will be maintained to preserve WA's RBG status for BJD in 2016 and beyond.

Western Australia's BJD Free Zone Status was the outcome and result of intensive testing, strict movement protocols with comprehensive Border Barrier Control, and on-going surveillance that met the conditions required for a Free Zone Status as set by Animal Health Australia and agreed by all Chief Veterinary officers within all states and territories and supported by a reputable veterinary epidemiology risk assessment and cost benefit analysis.

To Animal Health Australia

From Dr Keith H Walker

These are brief in principle comments to an "in general principle" paper.

Overall I dissent from the "new" thinking therein which fails to focus on supported effective diagnosis, control, containment and prevention of spread (of all endemic diseases not just JD) for the greater community good beyond an individual property/PIC. The fundamental objectives (item 8) are lacking vision in this regard driven by the reality of progressive and continuing withdrawal of Federal and State Government support over the last 25+ years. Ironically this ambiguity may well "allow individual producers to manage the spread of JD infection in accordance with their business requirements" Voluntary disease control will likely descend to no effective between property disease control at all!! South Australia may well prove the collaborative exception or even the model with respect to endemic sheep disease. The OJD national spread status (despite Gudair vaccine as a reactive response at farm level) attests to this reality.

Biosecurity was invented for the cost sharing agreements between industry and Government to manage expenditures for exotic disease incursions. AHA has brokered that application for government with industry but the field of effective on-farm disease prevention for endemic diseases has been progressively "out-sourced" to producers themselves. The basis of this document is no different!! That situation may be the now reality but the new reality proposed is both ill-defined and its form and implementation totally un-costed and un-sourced. Only the R&D elements have a logical and tested resource base for new initiatives.

AHA may channel education and communication efforts but footnote 1 page 6 specifically precludes financial support!! Many things are to be replaced as identified in the document but there is no form to or effective guarantee of "the tools" PROPOSED to be developed and how producers will get evidence based answers to any of the questions they may raise. The current most evidence and QA based BJD scheme i.e. BJD MAP is slated for "improvement" (which its audit mechanisms and other technical elements most clearly need in my judgement) but cost to industry and making "participation worthwhile" for that industry (which is glaringly diverse) is mandated as their entire national responsibility.

Therefore this risk based trading approach across the entire document is based more on wishful thinking than on Australian or global evidence of a viable industry and commercially driven alternative. This lack of precise definition and responsibility/resourcing is in my view the Achilles heel of this documented case. Critics of the past have been sharp and loud but as both a producer and veterinarian to me this "fresh approach" is dangerously ill-defined notwithstanding the promise of future process and content.

Thank you for your attention.

Dr Keith H Walker

iamkeithwalker@yahoo.com.au

Bovine Johne's Disease Review

I am writing to you in my capacity as President of and on behalf of the WA Branch of the Murray Grey Beef Cattle Society to express our deep concern regarding the proposed changes to the Bovine Johne's Disease (BJD) program. We strongly believe that there should be no changes to the current BJD Free Zone status of WA.

In this, we stand in opposition to our Eastern States National body who do not represent us in this matter. They represent the interests of a select number of eastern states breeders who are not concerned with WA interests.

Many of our WA Breeders feel that the changes will come into effect no matter what, even after very strong opposition at the W.A. forum which was the best attended of any of the state forums.

We see there are very serious dangers to our large live export trade from WA. This trade requires that we sell animals that are stipulated to be "BJD Free" to many of our most important overseas markets. Eastern states producers are not involved with these markets nor are they concerned about them, as there would be no significant economic damage for them and they are not particularly concerned with damage to WA markets. Changes could however have very large financial and management issues for WA cattle producers and exporters, possibly on the scale of the consequences of the previous government's ban on live exports. These unintended consequences resulted from poorly thought through policy designed to keep vested interests happy and they crippled some agricultural businesses who have taken significant time to recover from them.

The other major area of concern is the rather poorly defined replacement program that means many different things to many different breeders. We need to know where we stand, particularly as Stud Breeders and Seed stock producers, as we could have decades of genetic gain and a life time of work lost because of a careless application of poorly thought-through policy by government bureaucrats with no practical experience.

If these BJD proposed changes do come in, we will have no choice but to look at all legal avenues open to us. These include constitutional options and to lobbying our WA State Government to legislate to set up a BJD Free Zone for WA along the current BJD lines to look after our state's live export industry, stud stock and seed stock producers and of course all the allied support industries, transport, stock feed producers etc that are so dependent on our live export trade in and for WA.

In summary, the WA Branch of the Murray Grey Beef Cattle Society expresses our deep concern regarding the coming changes to the BJD program that is being proposed. We strongly believe that there should be no changes to the current **"BJD Free Zone status of W.A."**.

Yours Sincerely,

Leon .C. Stickland.

W.A. Branch of the Murray Grey Beef Cattle Society.

BJD submission

I attended the BJD Review workshop in August at Perth with around 80 other like minded WA Cattle producers. This workshop was run by Animal Health Australia committee from Canberra. This was the fourth and last workshop relating to the national BJD review.

For some reason (mainly economic I feel) there is a large push from cattle producer and organisations in other states of Australia to **remove** the BJD FREE STATUS WA currently has and has had since the BJD zone inception since 1990.

In Australia, BJD is managed under the NJDCP 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 control and official disease control program in the respective states/territories and the JDMAP to identify, protect and promote individual herds and flocks that are objectively assessed as having a low risk of being infected.

BJD needs to remain a notifiable disease and state/ territory authorities must maintain records of properties and origin for livestock destined for travel interstate and export to meet importing requirements. In some countries BJD is not notifiable, BUT in others it is.

WA and one small Provence overseas are the only two areas in THE WORLD to have a BJD FREE STATUS. An extremely important status to hold thus allowing enhanced export confidence with clients from around the world. The BJD FREE STATUS is vital for our export industry and domestic industry. The free status also enhances our domestic market as the cleanest in the world. 50% of the WA cattle trade is to the export market more than any other state in Australia.

I feel it's a true testimony to the BJD program in place at the moment that since the zoning system was put in place back in 1990 there has been only been a couple of cases regarding quarantine within WA. The WA Department of Agriculture has worked long and hard to keep our state clean. There needs to be a push to Local and Federal government for the continued funding for the Department of Agriculture and its Bio security protocol especially regarding the movement of livestock into WA.

There is absolutely **NO benefit to WA** if we where to lose the current BJD FREE STATUS. However there would be economic benefit to other states.

This whole review should not be about economic reasoning it should be about sound scientific reasoning, which is why the BJD Zones where implemented in the first place.

The removal of WA BJD FREE STATUS will have a direct effect on the entire WA Cattle Industry and could be catastrophic for seed stock producers, exporters and the domestic industry.

I URGE all WA Beef Industry organisations and individuals to get behind the United Beef Breeders Association (UBBA) of WA, WA Farmers Federation and Department of Agriculture to help fight for WA continued BJD FREE STATUS.

You need to act IMMEDIATELY, with a written comment by Midnight 18th November to the following email: bjdreview@animalhealthaustralia.com.au

Animal Health Australia committee are looking to implement the BJD review in February 2016.

Robin Yost

Dear AHA,

The proposed approach to BJD will probably have wide acceptance. I say this because it appears to leave any difficult decisions regarding management of the disease entirely at the whim of producers. Because they are human I suspect that many will default to doing nothing.

This is what currently tends to happen with biosecurity decisions. As a long term practicing veterinarian I have lost count of the number of very serious animal health problem that I have encountered that could have so easily been prevented with some basic (to me) biosecurity practices. Most people find it difficult to ask for any degree of assurance, even simple practices like a major 4 bulk milk test to screen for Strep ag and Mycoplasma bovis.

I am sceptical about the level of adoption of adequate biosecurity plans in the absence of either compulsion or at least some tangible reward (or penalty?)

If we are serious about reducing the prevalence of BJD and the degree of contamination of the environment and food chain with MTB there needs to be greater compulsion to participate. I believe we need to be serious before we are compelled to do so by some external entity that understands our industry poorly.

I would like a bit more emphasis on the roll of vaccination in decreasing risk.

Cheers

Peter Younis

Dr. Peter J. Younis BVSc. MANZCVS (Medicine of Dairy Cattle)
The Vet Group
PO Box 84
Timboon, Vic.
AustraliaDear AHA,



November 18 2015

To the BJD Review Committee, Animal Health Australia

Re: Response to the BJD Framework Document circulated on November 2 2015

Zoetis would like to provide some comments that relate specifically to the references made to vaccines and the planned review of the CattleMAP program detailed in the BJD Framework Document that was circulated to stakeholders on November 2, 2015.

While we appreciate that this document is not the place to make recommendations around the management of disease on farm, it is disappointing that the paper appeared to be calling for research funding to improve vaccines without acknowledging there is currently an **effective, registered vaccine available**. The document makes reference to a key principle of the strategy being to 'seek improvements in vaccines' and then later also indicates that funding will be sourced for ongoing R & D with respect vaccination. If this discussion is relevant then so is the existence of an effective and registered vaccine. Anyone reviewing the document that was circulated would be unlikely to be aware of this as it seems to indicate that this is not the case.

The efficacy of Silirum® has recently been demonstrated through the successful completion of a rigorous 7 year randomised controlled clinical field study and full registration by the APVMA. This study has collectively involved the support of the Victorian Government (integral in protocol design, study implementation and financial support for laboratory work), MLA (provided matched funding for the first 3 years through the Partners in Innovation program) and more recently, the Cattle Compensation Committee (supporting laboratory funding).

The study itself is unprecedented in Australia with reference to the time, money, effort and commitment that was required to ensure it would generate the data that Australia needs to make an assessment regarding the effectiveness of this vaccine. Among other findings, the results show that a **single dose of the vaccine given to calves demonstrated a statistically significant reduction in the number of animals shedding MAP in faeces**.

The results of this study were presented at the initial review meeting that was held in Sydney in February this year and it is Zoetis' intention to publish the results. The data generated by the study have also been utilized by Dr Richard Shephard in his economic modelling work that was undertaken on behalf of the Victorian Cattle Compensation Committee for the purposes of reviewing the current TCP3 program. Richard also presented findings that supported the efficacy and cost/benefit of Silirum vaccine.

Zoetis understands that the primary focus of this review is not to go into detail about what disease control and risk management tools are available and how they should be used, but if there is no acknowledgement through this process that an effective, registered vaccine is a currently accessible

tool then the greater concern is that vaccination won't be taken into account when resources such as the planned risk profiling tool and property and regional biosecurity plans are developed.

We hope that you agree that acknowledgement of vaccine availability is both relevant and appropriate for a comprehensive review of the National BJD Strategic Plan, and will form a greater part of ongoing discussions.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Sally Oswin'.

Sally Oswin

Technical Services Manager
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