**Comments on the NSW Government Draft Guidelines – June 2019**

**Biosecurity – African swine fever response: surveillance**

**Biosecurity – African swine fever response: tracing**

Thank you for the opportunity to review these guidelines. APV members seek to support the development of effective, efficient and timely plans to prevent and manage emergency animal diseases that affect the Australian Pig Industry.

Both Guidelines have been presented as stand-alone NSW approaches to what we believe should take a national approach. The industry is not state based, for some time the major proportion of businesses and the vets that work with them have operated across state borders on a daily basis. Either this document or the NSW Government is asked to provide certainty and detail about how it will interact with the other states to provide a seamless approach. We need a national consistency of approach.

The industry is also stressing the urgency of developing not only these guidelines but working protocols for many of the activities listed. There will not be time to do so once a diagnosis is made in Australia.

The guidelines do not appear to have incorporated many of the learnings from the current control operations in Europe and Asia and the 2014 UKs control plan for swine fevers, developed after experience with CSF.

There appears to be real benefits from tailoring responses to what is being seen with genotype 2 ASF in Europe and Asia, where the disease has generally been found to have a low initial spread within a herd (unlike FMD or CSF) resulting in an apparent low death rate, until infection is widespread. Infection when it does occur reliably results in high morbidity and mortality.

The guidelines appear to be heavily drawn from FMD plans. Key differences with ASF are :

* no role for transmission by air (pig industry dynamics suggest there may be no real basis for area based restricted areas pre stamping out or after decontamination and raises questions as does the UK plan about the benefits as opposed to the costs to industry and to the control operation of a stockstandstill),
* no pathognomonic clinical signs ie surveillance based on the guideline definition of an SP is likely pick up many non ASF herds, which will tie up resources,
* no evidence that the carrier state plays any role in transmission
* need to ascertain the value if any of laboratory test based surveillance in animals that are not showing clinical signs of disease, this applies to feral and commercial swine. It is not likely to provide the useful evidence as suggested (Surv 4.5.1)
* highly transmissible between enterprises by truck movements (as we are seeing in Asia ) so truck movements are a highly critical trace and establishing truck hygiene practices and clean down stations will be critical. Tracing at 4,1 almost ignores this risk, putting it lower than semen, for which there is no clinical/field evidence.
* A high risk feed may not necessarily be prohibited (Tracing 4.7.1 it may contain non-prohibited ingredients that introduce contamination (eg legally imported feed)
* need to address surveillance at semen collection centres as these centres and weekly liquid chilled semen supply are crucial to the survival and recovery of the industry, and
* no epidemiological role for milk processing plants.

More broadly the guidelines call for extensive resourcing. An ASF outbreak will undoubtedly call for extensive resourcing, but if that resourcing is engaged in dealing with movement controls or unrewarding approaches on surveillance then it will be wasted. Effort will need to be highly targeted.

The surveillance doc calls for private vets with pig experience to undertake on-farm surveillance. This is a highly limited resource likely to be already tied up with dealing with commitment to clients and sidelined by quarantine requirements.

The tracing doc does not accurately reflect enterprise types or operations in the modern commercial industry (Surv 4.4). It also does at 4.6 not include tracing off an IP after the first clinical signs are seen – it may take some time after the first clinical signs are seen to investigate and then confirm the diagnosis

With pigs moving off many farms at 3-4 if not 6 days a week, a key need will be to ensure those movements be permitted (if possible) or welfare issues will arise much faster than the 2-3 week stockstandstill being talked about in the industry. This is not just movement to slaughter, but movement to separate weaner and grower and even finisher sites over the production cycle.