

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

BACKGROUND

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

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

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

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

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

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

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

INDIVIDUAL FARM PRODUCTION AND ACCESS TO DOMESTIC AND INTERNATIONAL MARKETS

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

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

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

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

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

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

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

THE BIG PICTURE - BIOSECURITY AND DISEASE SURVEILLANCE

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

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