



Reforming Victoria's Biosecurity Legislation

Discussion Paper

Submission of the
Australian Veterinary Association Ltd

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The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

Reforming Victoria's biosecurity legislation – discussion paper

The AVA thanks the Victorian government for the opportunity to comment. We have the following comments related to the discussion paper.

1. Enhanced tools for traceability and assurance

Accurate timely traceability and assurance is essential to a well-functioning biosecurity system. The AVA supports reform that requires strong animal traceability and encourages any reform to recognise the need for a national approach to Australia's livestock traceability system, as animal movement is not limited to state boundaries.

2. Roles and responsibilities

The AVA strongly supports enhanced collaboration, sharing of responsibilities and improving awareness at all levels of society of the significance of biosecurity, given the increasing complexities and challenges we face as a nation. In Australian agriculture, our 'clean and green' reputation has provided a privileged trading position for many years, ensuring consumer confidence in terrestrial and aquatic livestock production in both local and international markets. This reputation is reliant on a sound animal disease biosecurity, surveillance and reporting system, and veterinarians play a crucial role in maintaining this. The contribution veterinarians make to the community is highly valued, underpins the health of animals and significantly contributes to the social license of animal industries to operate. The AVA would encourage legislative reform to specifically knowledge this by requiring all assurance schemes involving animals to require veterinary input.

We know that the impacts on our livestock and export industries would be catastrophic and cost the economy many billions of dollars, should diseases such as Foot and Mouth Disease, African Swine Fever or Lumpy Skin Disease gain entry to the country. In a time of heightened risk from both exotic and emerging diseases, as well as rapidly increasing global trade in animal products and human travel and resettlement, it is imperative that if greater coregulation is pursued as part of legislative reform then resourcing the delivery of the public good that this provides must be a shared responsibility. In the context of the veterinary sector the AVA believes that adequately resourcing public-private partnerships between the government and private veterinary sectors, and development of a coordinated framework for disease surveillance, prevention, and control, is key to success of this shared approach.



3. Scope of the reform

We support and encourage the development of a single unifying piece of biosecurity legislation encompassing all sectors – animal diseases, plant pests and diseases, and invasive plants and animals. There would however be a need for some sector specific provisions to be retained, for example all current Emergency Animal Disease (EAD) controls and powers, specific provisions for vital activities such as the prohibition on swill feeding of pigs and the ruminant feed ban. The current significant penalties must also remain for these offences.

A universal ‘duty of care’ is supported but must be underpinned by guidelines, standards, or codes to ensure everyone is clear as to what they need to do to meet that duty. This will differ between different animal ownership and use situations. Related to this, new legislation needs to allow for the setting of biosecurity standards for various sectors, species, and production systems. Effective farm biosecurity is vital for the protection of our animal (and plant) industries and to minimise the impact and spread of infectious diseases.

Victoria, through the Livestock Disease Act 1994, currently has very effective legislation providing the necessary powers and authorities for the control and eradication of EADs, and it is essential that any new legislation maintains all of those powers, which are found in few other state Acts.

Provisions for industry biosecurity funds

The AVA strongly supports the current legislative provisions in Victoria which provide a mechanism for livestock industries to collect funds (duties) from producers for (co-)investment in important biosecurity projects and programs. An excellent example is the co-funding by Victoria’s cattle, sheep, goats and pig industries of the Victorian Significant Disease Investigation Program, which provides subsidies to veterinary practitioners to undertake ‘public good’ surveillance through investigations on farms of defined disease events.

It is essential that any new biosecurity legislation retains these provisions, which not all Australian jurisdictions have. Furthermore, there would be value in extending such provisions to other commodities in the plant production sector.

We would encourage the inclusion of prevention, monitoring and managing of companion animal and wildlife infectious diseases to be included in issues in scope for reform.

Companion animal disease surveillance

For companion animals in Australia, disease surveillance has historically only taken the form of *ad hoc* surveys, or has focussed on adverse reactions to pharmaceuticals, and no formal companion animal disease surveillance activities are currently undertaken by government. Australia’s only national Australian companion animal multi-disease surveillance system was introduced by a pharmaceutical company in 2010. It operated for 7 years before being closed through lack of resourcing; over 26,000 cases of disease reports were collected during this time.

An historic lack of surveillance does not reflect a lack of need. In the event of a highly infectious disease outbreak affecting companion animals Australia is placed at significant risk due to the lack of formal surveillance or response framework. For example, the (formerly) exotic disease *Ehrlichia canis* was recently introduced and was not detected until it was quite widespread. Programs such as the



‘Significant Disease Investigation Program’ which provides subsidies to veterinary practitioners to support defined disease investigations in livestock, should extend to companion animals, and supporting legislation should reflect this.

Wildlife disease surveillance

Disease surveillance in Australian wildlife is coordinated by Wildlife Health Australia (WHA), who work collaboratively with a range of government, non-government, private veterinary services and lay wildlife groups. Seventy-five percent of human infectious diseases that have emerged in recent decades have had an animal origin, with most recent serious examples arising from wildlife (eg Hendra virus, Japanese Encephalitis, avian and swine influenza, Nipah virus, COVID-19, and SARS) so wildlife disease surveillance will only become more important in the face of climate change, land clearing and ongoing human encroachment on wildlife habitat. The AVA welcomes the recent announcement by the Australian government for improved funding of WHA to undertake this important activity. This must be supported by effective biosecurity legislation in Victoria.

Related to wildlife disease surveillance and control, new legislation needs to include a strong, direct and explicit application to all environmental biosecurity including pests and disease threats to the natural and built environments, and to social wellbeing. This includes the aquatic environments – marine and freshwater.

4. Integration Supported by Technology, Research and Data

The AVA encourages legislative reform to allow for provision for advancements in technology, particularly around data, and disease detection. Legislative reform that acknowledges the need to nationally harmonise data collection across a range of areas including diagnostic capability and traceability would serve Victoria well. The use of innovative diagnostic technologies must also be supported in contemporary legislation, to increasingly support the use of Point of Care testing platforms by private veterinary practitioners on the front line of disease surveillance.

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