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Service Delivery Division
Biosecurity Regulation and Reform Policy
Department of Agriculture
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Dear Sir/Madam

Examination of the Import Risk Assessment Process

Australian Pork Limited (APL) welcomes the opportunity to provide a submission to the Examination of the Import Risk Assessment (IRA) process. The examination focuses on consultation; science; and regional differences; and we provide brief comment on each of these in turn.

Consultation

APL is broadly comfortable with the level of, and opportunities for, consultation during the IRA process. APL expects a high standard of consultation during this important process, and that this consultation starts as early as possible. The IRA handbook is sufficient and in our view does not require modification. The existing process allows for industry input at the appropriate times.

The science behind the process

APL recognises the Department's substantial in-house scientific capability, supported by external expertise as required, particularly where the science may be contentious or there may be objections. However, APL can only support Departmental reliance on international expertise which is independent of nations that have a significant interest in seeing Australia's biosecurity protocols weakened or removed. The Department should always avoid engaging experts from those nations. For these reasons, APL appreciates full transparency on the background and interests of all external experts and eminent scientists engaged in the IRA process.

The Eminent Scientists Group (ESG) is a critical part of the IRA process and its central role should be maintained. The suggestion in the discussion paper to expand potential membership of the ESG to a larger flexible panel is not unreasonable provided that the composition of this panel is well known and any industries affected by an expanded IRA have the right of veto for these selections.

Regional differences

It is APL's strong view that Australia should not unilaterally acknowledge regional differences in the absence of a reciprocal agreement with a trading partner. Additionally, such an agreement must go much further than the "general considerations" and "principles" outlined in the OIE's Terrestrial Animal Health Code. For instance, trading partners in North America have been unable to halt the aggressive spread of Porcine Epidemic Diarrhoea Virus, let alone understand how the disease spreads. Similarly, an outbreak of African Swine Fever has been spreading west through Europe for several

years, apparently unchecked. These diseases have confounded “official control” and it would be foolhardy, in these cases, to take any regional difference into account when calculating import risks. For these reasons, and in the absence of a stronger framework for establishing a regional difference, APL cannot support their consideration in the IRA process.

Should you have any queries relating to this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Deb Kerr', with a stylized flourish at the end.

Deb Kerr

General Manager, Policy