

# Submission

## BJD – Where to from here

**To:**  
**BJD Review Panel**  
**Animal Health Australia**

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**Prepared by WAFarmers Federation**

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## **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 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.