



Unit 40, 6 Herbert Street St Leonards NSW 2065

Telephone: (02) 9431 5000 Facsimile: (02) 9437 9068

Email: [members@ava.com.au](mailto:members@ava.com.au) Website: [www.ava.com.au](http://www.ava.com.au)

## **SECOND SUBMISSION FROM THE AUSTRALIAN VETERINARY ASSOCIATION TO THE BEALE INQUIRY**

At our meeting in Sydney on Tuesday 17<sup>th</sup> June 2008, the Panel asked the AVA to provide more information about its views on several subjects. We are pleased to provide these responses below.

### **OVERVIEW**

Australia's agricultural productivity and access to world markets are dependent on freedom from epizootic diseases. This freedom relies on effective means of surveillance, early detection and early response to demonstrate the absence or distribution of diseases.

The Australian Veterinary Association's (AVA) recommendations are based on the concept that effective biosecurity requires a continuum of pre-border, border and post-border surveillance and detection. The 2007 equine influenza outbreak, and the subsequent findings of the Callinan Inquiry, highlighted that several key areas of the biosecurity continuum that depend on veterinary science and veterinarians are under resourced.

This submission recommends a number of actions that will address these deficiencies. These actions can be implemented in the short term, and will deliver a return on investment within 1 – 10 years by maintaining and enhancing Australia's appropriate level of protection (ALOP).

With increased investment in pre-border and border quarantine, it is vital that post-border considerations are not forgotten. Most of the recommendations below focus on filling the obvious gaps in our post-border preparedness.

The emerging importance of global food security issues warrants investment in the profession to assure the supply of high quality protein to a world increasingly needing and demanding it. Now is the time to improve and invest in our veterinary infrastructure.

### **Summary of Recommendations**

- Establish a 'Virtual' Centre for Disease Control and Prevention (CDC), linking current institutions for human and animal health, that enables effective and rapid sharing of knowledge and information. This should be achieved by building stronger ties between the Chief Medical Officer and the Chief Veterinary Officer.
- Support the Australian Animal Disease Training Initiative (AADTI).
- Increase funding to the state and territory veterinary services, and engage state and territory services in quarantine and biosecurity through legislation and memoranda of understanding.

- Establish better flows of scientific information between AQIS and DAFF, provide targeted professional development programs so scientists are qualified to take up senior posts, and establish a formal transparent structure for auditing and review of quarantine procedures and processes.
- Establish an Australian veterinary scholarship initiative to encourage 200 veterinarians into government and private practice and veterinary pathological practice.
- Increase funding for agricultural and veterinary research through the Australian Research Council and other bodies.
- Expedite the development of veterinary specialists (with a focus on veterinary pathologists) based on reform recommendations made jointly by Australian Veterinary Boards Council, the Australian College of Veterinary Scientists and the Australian Veterinary Association.
- Change structures and communication systems of AQIS and Biosecurity Australia to support and promote veterinary and scientific leadership amongst employees.
- Provide additional support and expand the Australian Veterinary Reserve and Australian Veterinary Practitioner Surveillance Network.
- Provide training for quarantine staff on animal welfare requirements (codes of practice, standards and guidelines) and the major animal welfare issues of the day.

## **1. ONE HEALTH, ONE MEDICINE, ONE WORLD**

More than 70% of diseases emerging in the last 20 years have been zoonoses capable of transmission between animal and humans.

As a result there is international recognition of a reliance on interaction and cooperation between key stakeholders involved in the promotion and protection of both human health and animal health.

One example is the threat of an avian influenza pandemic in humans. H5N1 virus is spreading globally and to date has killed 240 people in several countries.

The Center for Disease Control and Prevention (CDC) in Atlanta, Georgia, USA provides the scientific and regulatory underpinning of American efforts to control and prevent such diseases. It supports a cooperative approach to surveillance, detection and management by animal and human health scientists, researchers and practitioners.

### **Recommendation:**

- State and federal institutions are already in place, and the AVA therefore does not believe Australia requires a “bricks and mortar” institution like the

CDC. We believe, however, that there is a critical need for a lead agency to coordinate the establishment of a “virtual” organisation that links current institutions and enables effective and rapid sharing of knowledge and information.

## **2. INVESTMENT IN GOVERNMENT VETERINARIANS, PATHOLOGY LABORATORIES AND RURAL VETERINARIANS.**

Most states had regional veterinary organisations until the 1980s. Each jurisdiction was divided into regions or districts, each headed by a regional (or district) veterinary officer supported by veterinary officers and stock inspectors. Regulatory activities and recording were based on “farm files” which recorded disease and welfare and provided the basis for certification.

Budget cutbacks reduced this infrastructure, leaving some states without regional systems. Greater reliance was then placed on the private sector. The private sector input to the food animal sector has been undermined by successive droughts and the poor income from that sector. The states and territories were placed under additional strain by the termination of the agency arrangement for quarantine. Vets in rural areas have turned to dog and cat work in the struggle for sustainability. With clear signs of future rises in food prices, now is the time to invest in veterinary resources in rural areas.

The table below shows the approximate number of state and territory government vets 1980-2000, and vets employed in field roles as at 2000.

	<b>1980</b>	<b>1990</b>	<b>2000</b>	<b>Field vets @ 2000</b>
<b>NSW</b>	134	122	109	7 +40 Rural lands protection board vets
<b>Vic</b>	96	68	41	21
<b>Qld</b>	70	68	41	21
<b>Tas</b>	23	21	17	7
<b>SA</b>	40	32	14	4
<b>NT</b>	9	20	17	7
<b>WA</b>	43	44	43	16

Heath TJ Number and distributions of Australian veterinarians in 1981, 1991 and 2001. *Aust Vet J*;2002;80:3–8.

### **Pathology Services**

State laboratories were privatised (except for a central reference laboratory) training programs were dismantled, and private laboratories now focus on companion animals for greater financial return. Pathology services previously provided free for production animals are now subject to high charges. The costs of laboratory services often are not justified by the value of the animals.

With the rise in focus on food safety and security, as well as projected rises in food prices it is timely that there is reinvestment in the sector that secures it. We

must ensure that laboratory services are properly resourced at levels to enable rapid disease detection and diagnosis. This need was clearly demonstrated by the onerous demands on the Elizabeth Macarthur Agricultural Institute in the recent equine influenza.

The AVA supports the Australian Animal Disease Diagnostic Training Initiative, which will help towards the provision of adequate veterinary scientific staff to run a vibrant regional laboratory service with over-arching support from Australian Animal Health Laboratory. The regional laboratories can act as the first line of diagnostic capabilities and must be adequately resourced and funded. This initiative has been estimated to cost approximately \$22 million over five years (\$17 million contributed by government). It will establish a consortium of six universities to address the serious skills shortage and help to re-establish laboratory diagnosis as a valued career path.

The Biosecurity Cooperative Research Centre is currently funding two scholarships in pathology. We believe that additional support for the veterinary pathology sector should provide more scholarships for young veterinarians to encourage them into rural areas and fields that support our food animal sector.

This will enable Australia to demonstrate to our overseas trading partners and the OIE, that we have strong surveillance and diagnostic capabilities and this will allow us to protect our markets but also address the issues of food safety and food security.

### **Rural Veterinary Practice**

Rural veterinary practitioners have been at forefront of disease detection and surveillance. It has been clearly shown that the sooner exotic or emerging disease is detected, the greater the chance of minimising its impact on animal and human health and the economy.

The table below shows the approximate number of vets in rural Australia in 1981, 1991 and 2001, as a percentage of the total number of vets in Australia.

Although these statistics show the number of vets in rural areas increased over the period 1981-2001, there was a strong deployment bias towards closely settled coastal areas. This change contributes to decreased passive surveillance in other rural areas.

The shortage of rural practitioners and difficulties faced in recruitment and retention are well documented. Increasingly, a significant percentage of the work done by rural veterinarians is companion animal related. This helps to keep them sustainably in work in rural areas, but also means that there is less veterinary input to food and other large animal species.

	<b>1981</b>	<b>1991</b>	<b>2001</b>
# vets in rural Australia	1332	2014	2476
Total # vets Australia	3177	4757	6358
% of total	42%	42%	39%

Heath TJ Number and distributions of Australian veterinarians in 1981, 1991 and 2001. *Aust Vet J*;2002;80:3–8.

### **Recommendations**

Investment in these areas is critical, along with a cooperative approach that better utilises the resources of universities and government and private laboratories. Specific initiatives for immediate action are:

- Scholarships to encourage veterinary graduates to enter government and pathology practice (in rural areas), and food animal private practice positions. Our initial recommendation is that 40 graduate scholarships of \$75,000 (15K x 5 years per graduate) be provided a year for 5 years. This is a total of \$15 million over 9 years. This could be administered by the AVA and we can provide costings for this. Part of the focus of these scholarships would be animal welfare, as well as field or pathology work.

An alternative to scholarships is student loan offsets. In the USA this is the basis of a very significant initiative to stimulate veterinary graduates into rural practice through the National Veterinary Medical Services Act.

[http://www.csrees.usda.gov/nea/animals/in\\_focus/an\\_health\\_if\\_nvmsa.html](http://www.csrees.usda.gov/nea/animals/in_focus/an_health_if_nvmsa.html)

There is significant investment into veterinary medicine, public health and biosecurity by the US Armed Forces with a significant number of veterinarians engaged and separate scholarships offered to them.

- Current standards and costs to train and register pathology specialists in Australia are higher (and so more restrictive) than the USA and European equivalents. The Government should take an active role in encouraging a review of current registration costs. There is evidence that targeted scholarships to offset the cost of becoming a fellow of the Australian College of Veterinary Scientists may also be effective.
- Increases in direct funding for agricultural research (including animal and veterinary research) from the Australian Research Council is a sound investment in the future.
- Government funding should be provided for the Australian Animal Disease Training Initiative. Details on the initiative are available from Animal Health Australia.

### **3. ENGAGEMENT OF STATE AND TERRITORY SERVICES IN QUARANTINE**

It must be recognised that diseases are transboundary and a national co-ordinated approach is essential. In addition to increased resources to the state and territory veterinary services, there is a need to engage state and territory services in quarantine and biosecurity through legislation and memoranda of understanding. These should provide:

- defined pathways of control and command with AQIS having the overall responsibility.
- a pre-defined existing structure to enable rapid enactment and application in the event of an outbreak.

### **4. ENHANCING VETERINARY AND SCIENTIFIC LEADERSHIP**

The Callinan Inquiry findings suggest that AQIS and the Eastern Creek Quarantine Station focused on administrative, rather than policy or operational, objectives and this contributed to the escape of equine influenza virus from the station.

Generalist public service managers must be capable of accessing and accepting technical advice, building an understanding of the science and the industries they serve, and acting on corporate memory. Management failure in these areas contributed to the outbreak of equine influenza.

AQIS scientists and veterinarians have generally not had sufficient access to advice and information from Biosecurity Australia. The professional isolation of AQIS veterinarians left them without the background to ask the right questions of Biosecurity Australia and professional value judgements were made by unqualified people. Lack of access to the world disease situation and to the temperatures of horses at Eastern Creek contributed to this outbreak.

The Chief Veterinary Officer and the Chief Plant Protection Officer have to lead their disciplines. They need to be senior enough to coordinate and lead professional activity. DAFF has in the past had a veterinary forum chaired by the Chief Veterinary Officer or Deputy Chief Veterinary Officer with the former reporting to the DAFF executive on key issues. Held monthly or bi-monthly, these sessions keep all participants up to date and across issues, and create synergy, peer review and peer acceptance.

The only way to be assured we have world's best practice is to know what we have at this moment. Auditing and reviews need to be:

- Independent
- Regular
- Documented
- Deficiencies found need to be rectified in a timely fashion and with appropriate funding.
- Budgeted as a priority and not carried over from year to year due to lack of funds.

- Results of inspections and audits to be published on a website for the public record.

### **Recommendations**

- Establish targeted professional development programs to ensure government scientists and veterinarians with appropriate experience and skills, undertake Senior Executive Service and managerial roles. A quota of people in these roles having scientific or veterinary qualifications may also help.
- Structural reform is required to strengthen the “two way” flow of information between AQIS and DAFF. Employees must be encouraged to participate in the scientific community and be up to date in their fields.
- Establish programs to support and encourage AQIS veterinarians to participate actively in the DAFF and broader national scientific communities. Agencies must provide access to relevant continuing education, and actively encourage publishing of their work in professional journals and conferences.
- Resume a regular veterinary forum chaired by the Chief Veterinary Officer or Deputy Chief Veterinary Officer with the former reporting to the DAFF executive on key issues.
- Establish a formal, transparent structure for auditing and review of quarantine procedures and processes.

## **5. QUARANTINE SERVICE STRUCTURES**

Quarantine access decisions will continue to be controversial. A dilemma exists in the necessarily conservative approach demanded by Australian stakeholders and the risk analysis approach (and dispute settlement procedures) mandated by the WTO Sanitary and Phytosanitary Agreement.

The AVA recognises that access decisions are multidisciplinary and complex. They must be based on scientific import risk analysis and implementation of the Acceptable Level of Protection. The economic consequences of access decisions have to be assessed to allow realistic decision making.

Australia will continue to pursue conservative policies and it is important that trading partners do not consider decisions to be politically motivated. It is best if ministers do not make quarantine access decisions, and there is a defined appellate process based on the merits of the case and not involving ministers. An ombudsman or similar role could review decisions independent of the original decision-making process.

The minister must be responsible to parliament on quarantine decisions. The minister’s role should be defined in legislation. Even an authority to overrule decisions would have a place. Such authority would have serious consequences and would be used only in particular cases.

The recommendations below address a broad range of issues covered in the AVA's written submission and /or discussed with the panel.

- The Secretary of DAFF should be the decision maker not the Quarantine Council if it is established. Decisions should not be made entirely within DAFF, however. There should be some involvement from outside people. For example, the Eminent Scientists Group is crucial in ensuring that import risks analyses are peer reviewed but is not an appropriate body for decision making.
- Nor are the courts suitable for making quarantine decisions. The imported pigmeat case demonstrates that courts are not appropriate bodies for making decisions based on science. Courts will always have a place in appealing or deciding procedural matters. Decisions can appropriately address procedural matters under the Administrative Appeals (Judicial Review) Act. There would also be access to common law. Court decisions refusing market access would not, of themselves, be a defence in WTO appellate bodies. Such bodies would examine the merits of the case against the Sanitary and Phytosanitary Agreement and other obligations.
- There is a need for open transparent consultation. Routine consultations with stakeholders could continue in the current way. More complex consultations on major matters that have "sticking points" or have been subject to extensive dispute could be undertaken by a Quarantine Council or committee of such a Council. It is necessary that all reasonable views and objections be taken into account in the decision-making process, not at the appeals stage.
- The AVA commented in its earlier submission how matrix management is inappropriate in a regulatory organisation. The role of Government Veterinarian for Horses addresses only one matter. The process should be applied across AQIS to all appropriate species
- A Charging Review Committee should be established. The fees charged for horses showed that this process had lapsed. Management must remain aware of the implications of inadequate fee structures in cost recovered services. They must be convened regularly, annually or biennially.
- The link between quarantine and exports should be retained in AQIS and Biosecurity Australia. Exports of animals and genetic material are complementary with quarantine. Access negotiations are based on similar standards and rules. Training and aid provided to developing countries such as those in the Arabian Gulf, contribute to world animal health and food safety and assist Australian food exports. Live animal exports demand the same level of scientific underpinning, discipline and transparency as quarantine and biosecurity.

## **6. THE AUSTRALIAN VETERINARY RESERVE**

The Australian Veterinary Reserve (AVR) was developed to provide Australia with a specialist force of veterinarians from the private sector, with skills that

could be deployed within a national response to an emergency animal disease outbreak (EAD).

The initial training program allowed for 100 AVR members, selected for their willingness to participate in biosecurity training, geographic location, (to allow local knowledge to be utilised), and their surveillance capability via their existing client base.

The deployment of the AVR during the equine influenza outbreak in August 2007 in Australia highlighted that the value of AVR members (as specialists with biosecurity training and an ability to work in government response program) was not understood and their services under-utilised in the response.

It is important that both federal and state governments find a way to properly utilise this force. With the continued winding back of state government veterinary services and the Rural Lands Protection Board veterinarians, an EAD outbreak in the future will add further pressure on a diminishing trained skill set. An EAD response will require enough resources to withstand the surge in demand for expertise, and the ability to rotate reservists to allow rest and recreation. The existing force of 100 needs to be augmented.

The ability to contract this AVR expertise to educate and train both rural veterinarians and, as a consequence, their clientele, will ensure that profiles of both "on-farm" biosecurity and food security are elevated to the highest possible level.

### **Recommendation**

- Increased investment in the Australian Veterinary Reserve to strengthen training and increase the numbers of the AVR to allow for greater flexibility in EAD responses.

## **7. ANIMAL WELFARE**

Animal welfare plays an increasing role in public policy related to animal health and production. These issues are increasingly political as the messages of animal activists influence public opinion in an increasingly urbanised and affluent population.

Efforts have been made, particularly by the EU, to include animal welfare standards in trade standards. Many countries feel that they accept increased production costs of improved welfare only to find that cheaper imports are produced under inferior animal welfare systems. While it is unlikely that animal welfare will be introduced in the WTO's Doha Development Agenda 2008 meeting, the matter is a genuine issue for Australia.

### **Recommendation**

- Quarantine staff have a regulatory role and must be trained in, and aware of, animal welfare requirements (codes of practice, standards and guidelines)

and the major animal welfare issues of the day. They also need to understand the issue's cause, its physiological basis and the research that provides scientifically based procedures and processes.