

# NATIONAL AQUACULTURE COUNCIL INC.



28<sup>th</sup> April 2008

quarantinebiosecurityreview@daff.gov.au

RE: QUARANTINE AND BIOSECURITY REVIEW

To whom it may concern,

The National Aquaculture Council is the peak body representing over 98% of the Australian aquaculture industry. It has collated information from a number of its members including Prawn, Salmon, Pearl, Oyster, and Tuna farming, to ensure most of the priority issues are covered in this submission.

Unfortunately not enough time has been provided to ensure a comprehensive report is provided by this important industry on key aspects that seriously impact on its growth and future profitability.

The Federal Government must seriously look at the resources needed to ensure it has the capacity to adequately deal with Biosecurity issues in the aquatic environment. On an international scale it has merely provided lip service to meeting the needs of stakeholders and ensuring effective strategies can be implemented to resolve key issues that have been identified.

The survival of this rapidly growing industry is dependent upon a closely integrated programme of support services such as

- Quarantine,
- Biosecurity,
- trade and market access,
- response by Government to non-tariff trade barriers

I would be pleased to meet with the review group to discuss in detail the various aspects of this submission and to provide additional input from key producing sectors.

Thank you for your assistance.

Yours sincerely

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**QUARANTINE AND BIOSECURITY REVIEW**

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Aquaculture is an emerging industry and is becoming of vital importance to the future of the Australian economy and supply of Australian seafood. Global production of wild caught seafood has reached maximum sustainability due to a range of issues including, environmental change., reduced access and reallocation of resources.

Seafood is an important food source, providing a range of health benefits not available, or less pronounced, in other food staples. Aquaculture is almost entirely a regional industry and is a key growth area for regional jobs. While wild-catch fisheries have reached their maximum yield, low cost aquaculture producers such as China, Thailand and Vietnam are growing their seafood production at an incredible rate. Imports from these countries have put great strain on Australian aquaculture, unable to compete with imports on price, even though it produces high quality product. The strengthening of the Australian dollar along with significant increases in the price of oil and fishmeal have also added to the cost of production.

“Last year the production in the aquaculture sector rose by 7500 tonnes (16 per cent), while production in Commonwealth and state wildcatch fisheries fell by 9500 tonnes (13 per cent) and 35,200 tonnes (21 per cent) respectively. Despite this decline, the total gross value of production increased by 1 per cent (\$27.6 million) to \$2.13 billion. This increase was the result of an 18 per cent (\$114 million) increase in the value of aquaculture production, which compensated for declining production values in the Commonwealth and state wildcatch sectors. The gross value of production in the Commonwealth sector fell from \$330 million to \$278 million (16 per cent), while the value of production from state wildcatch fisheries fell from \$1.18 billion to \$1.14 billion (3 per cent).” (ABARE 2007)

These statistics present a challenge to both government and industry if the necessary infrastructure, regulatory frameworks, aquatic animal health and market access issues are to be addressed so as to facilitate aquaculture to grow efficiently, viably and sustainably to fill the serious seafood demand gap. Australians need to be able to source locally grown high quality products. If it cannot, this will be at the expense of regional development, jobs and the Australian seafood industry’s contribution to the nation’s economy.

It is critical that Governments and industry ensure policies are adjusted accordingly to enable this emerging industry every opportunity to grow. This will lead to a sustained growth of valuable export commodities. Examples of this growth are reflected by industry in the anticipated increase in production and value that could access the EU.

- Yellowtail kingfish: 5,000t (\$60m)
- Prawns: 1,000t (\$16m)
- Oysters: \$10m
- Southern Blue Fin Tuna; 500t; (\$15m)
- Abalone: 300t (\$10m)
- Barramundi: 500t (\$7.5m).

The Federal and State Governments need to commit resources to this area of diminishing expertise in aquatics. Enormous effort goes into developing strategies such as AQUAPLAN but virtually no resources are being allocated for the implementation of such strategies.

Aquaculture is the sentinel of the marine environment. The NAC is looking at ways the industry can build on this role for Government.

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Quarantine and Biosecurity is an important area of policy and industry development that needs urgent attention over the next 4 years. Specific issues that require attention are as follows.

#### *Appropriate Level of Protection*

The NAC supports the Tasmanian Salmon Growers submission that provides extensive detail on the industry issues concerning the ALOP. The Government must ensure that the ALOP is strengthened to protect the aquatic biodiversity.

#### *Importation of Seafood*

Import Risk Assessment: This is a contentious area for the industry and has created much debate. The NAC support the Governments decision on the prawn IRA and believes that appropriate science must underpin the decision making process. This must be independently evaluated so that various interest groups do not overly influence the agenda. The protection of Australia's biodiversity is critical.

#### *Importation of Live Mussels*

The NAC is strongly opposed to the import of live mussels from New Zealand and AQIS must ensure that it conducts thorough consultation with affected stakeholder groups before any decision is made. The risks of introducing pests are quite high and such introductions must be avoided.

#### *IHHNV*

The NAC is concerned with the tone of the current debate by seafood importers on the speculated occurrence of non-endemic IHHNV strains. Resources need to be allocated to an effective strategy that will resolve this debate. The NAC is keen to be involved in addressing this issue with the Government.

#### *Invasive Marine Pests - Management Guidelines*

At the request of the Federal Government, the NAC and DAFF have developed guidelines for best practice in biofouling management in the translocation of aquaculture equipment. Resources are now required to assist the adoption of the guidelines by industry. There also needs to be a maintained data base and reporting system that adequately services the industry at a local and national level on the management guidelines as they relate to invasive marine pests.

#### *AQUAPLAN*

An initiative of the Federal Government was for the Aquatic Animal Health Committee to develop a strategic plan to prioritise and resolve aquatic animal health issues through AQUAPLAN . Unfortunately the Government has not provided the resources to successfully complete projects within the plan.

The NAC seeks a commitment from the Government to resource Government and industry leadership in implementing the AQUAPLAN – an initiative for the practical application of key projects that builds the capacity of stakeholders to tackle aquatic animal health issues. It is critical to support a structure with influence that can implement the key projects in AQUAPLAN.

The projects below have received the support from the Aquatic Animal Health Committee (AAHC) and have been developed in consultation with this group as well as various State agency representatives.

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There are a number of projects necessary to address aquatic animal health issues, including:

*Translocation*

The industry must develop strategies that enable the secure movement of stock from selective breeding programmes without the risk of introducing pathogens. Industry and the State agencies through the AAHC have endorsed the proposal to create and adopt national technical guidelines for the translocation of live aquatic animals with respect to pathogens. The benefits from these national breeding programmes will not be fully realised until protocols are developed by the various stakeholders. These will need to be road tested across Government agencies.

*Emergency Animal Disease Response Agreement (EADRA).*

State and Federal Governments consider the development of an EADRA as an urgent priority. This will require significant engagement of industry and the NAC is prepared to facilitate this process.

Compensation for the compulsory slaughter of stock still remains an issue. This needs to be addressed as part of the EADRA and a resolution provided by the stakeholders from Government and industry.

*Chemical Registration*

The registering of key therapeutants - the industry requests that the Government commit to resources to assist in the registration of important therapeutants through Minor Use Permits and assists with on farm training and information sessions on treatment of serious disease situations. The NAC has taken responsibility for this role but is seriously under-resourced to ensure it is achieved effectively.

*Surveillance and Awareness*

As part of a training tool for industry on disease awareness and surveillance the NAC requests that resources be provided for the production of 1,000 "Disease Watch" CDs and distribution to stakeholders.

*On Farm Emergency Response Procedures*

The industry has recently developed training tools for emergency response procedures but these need to be extended into the industry to ensure successful adoption and implementation.

*Aquatic Animal Health Administrative Structure*

The aquatics sector does not have an equivalent plant or animal health structure or body (Animal Health Australia and Plant Health Australia) to support the industry and implement research and development. The industry requests the Government to commit resources to run a secretariat that could support a structure responsible for the implementation of AQUAPLAN and the key priorities within it. This is anticipated to be in the vicinity of 120k per year for the next 4 years by which the majority of issues should be resolved including those above.

*Aquatic Animal Health Capacity Building*

Industry aquatic animal health service providers and researchers have long argued for on-going dedicated Government funding for aquatic animal health research related to exotic or emerging diseases. Resources need to be dedicated to monitoring, diagnostics and response capability for diseases which pose an external threat to aquaculture and other fisheries in Australia. Below are some of the concerns from both industry and Governments.

(a) *Skill Shortage*

There is a shortage of skilled personnel (in many cases there are only one or two, if any, skilled personnel) in each diagnostic laboratory who can deal with non-routine investigations. Resources are required not only to hire more staff but also to train new graduates as aquatic animal health specialists.

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(b) *Lack of Infrastructure*

Not only are the aquatic animal health specialists ageing but also old laboratory equipment that cannot be serviced needs to be replaced. Diagnostic laboratories need to be up-graded. Modern equipment is needed to be bought and maintained.

(c) *Lack of basic background science*

We know almost nothing about the physiology and immunology, and the parasites and pathogens, of the newer aquaculture species farmed in Australia. Previously unknown infectious agents are being detected on a regular basis and nothing is known about their pathogenic potential unless they already cause disease. e.g. abalone herpes-like virus; oyster odoema disease. Little characterisation is undertaken on these newly emerging agents which may have serious economic consequences in the future (cf amoebic gill disease affecting farmed Atlantic salmon in Tasmania).

(d) *Lack of resources*

Staff have core duties that cannot be suspended in order to undertake new activities. Existing projects with their own deadlines and milestones that need to be met cannot be "dropped". The core work-load is increasing with no increase in resources. For example, NATA accreditation is expected even though there are no new resources to gain and maintain accreditation. In some instances, external funding is used to fund what used to be perceived as "core" activities. For example, very little research was undertaken on a newly emerging, significant virus (abalone herpes-like virus) for over a year until some (little) funding could be identified.

Just like when there are newly emerging issues in terrestrial animal health (e.g. Hendravirus, FMD outbreak in UK, avian influenza, SARS) and extra funding is made available, mainly from appropriation funds, to address these issues, extra funding is required for aquatic animal health.

The research providers, State agencies and industry will need to contribute to deliver on the various initiatives. State Governments will also be required to participate in the many activities and although this may not be seen as a direct financial contribution in some instance costs will be directly recovered from industry.

*Ballast water*

The industry is seriously concerned about the issue of ballast water. Due to the associated risks ballast water should be dumped as far as possible out to sea. It is understood that the Government is considering a limit of 12nm on domestic shipping and 200nm on international vessels. Industry requests the Government to enforce this policy through AQIS arrangements.

*Resources*

The Government commit resources to ensure the above is satisfactorily achieved.

*Communication and Consultation*

Good effective consultation with industry is lacking. Governments must take steps to improve effective communication and consultation with stakeholders. A strategy needs to be developed and implemented. This will include the need for a database(s) that provides clear and concise information for stakeholders that includes information on the issues above. The processes and jurisdictions for dealing with quarantine, ALOP and food safety are very bureaucratic and are very time consuming for organisations such as the NAC. Efforts must be made to streamline the processes where possible

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