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### **Submission to Quarantine and Biosecurity Review**

**The National Herd Improvement Association of Australia Inc. is the peak body representing the herd improvement industry in Australia. Our organization welcomes this opportunity to make a submission on a subject that is of enormous importance to our members and the farmers they serve, as well as the wider economy in Australia.**

The term, herd improvement, collectively applies to organizations which provide cattle farmers (dairy and beef) with the products and services required for the Artificial Insemination (AI) of cattle as well as the herd testing capability to measure and assess the performance of the progeny, thereby contributing to sire summaries which, in turn, lead to significant genetic progress.

The herd improvement industry is affected in this matter mainly through the import and export of bovine semen and embryos.

Genetic improvement delivered via artificial insemination (AI) has played – and continues to play – a key role in the productivity of the dairy and beef industries. Research estimates that some 30-40% of the very substantial gains in individual cow milk production made in the past 20 years have come about through genetic improvement. The competitiveness of the Australian dairy industry, especially, is reliant upon the continued delivery of AI and genetic progress.

#### **C1. Risk across the quarantine and biosecurity continuum**

This organisation is not in a position to comment upon the adequacy of Australia's emergency response plans for exotic pest and disease outbreaks as we are not one of the peak industry bodies consulted on these matters.

From a semen and embryo importer's perspective, there is a clear sense of frustration that the current under-resourcing of AQIS has placed severe pressure on the system. This under-resourcing has led to delays in obtaining permits or answers to queries.

This is not to imply in any way that AQIS personnel 'at the coalface' are unhelpful, but rather to make the point that numbers are thin and experience is limited which can result in significant and costly delays. This applies to risk analyses, permits and routine queries.

There is sometimes confusion about areas of responsibility. For example, one of our members recently requested clarification from AQIS on import requirements for semen from cloned animals. They were referred to Biosecurity Australia which subsequently referred them to Aus/NZ Food Standards which referred them back to AQIS.

From an exporter's perspective the position is even worse. The arrangements for export inspection and certification are neither effective nor conducive to the expansion of Australia's capability for international trade.

The European Commission Report carried out in February 2007 highlighted the areas where there are significant deficiencies in these arrangements. There is a concern that the under-resourcing of AQIS operations will continue to present problems in this area.

Furthermore, staffing constraints currently are delaying accreditations for export to other countries such as China and some South American countries.

## **C2. The legislative framework**

There is some concern within our industry that the current roles and responsibilities of the Commonwealth and the States are not well understood.

There is some confusion as to the differing roles of AQIS and the DPI in some areas, mostly in NSW and Victoria. This was touched upon in the European Commission report of 2007.

Furthermore, there appears to be a tendency to consolidate or centralise operations in Canberra to the detriment of operational resourcing within the States. In Victoria in recent times, there were only two veterinarians dealing with export certification, one of whom is almost occupied full time with Live Animal Exports. Anecdotal evidence points to the issue of there being no senior level veterinarian to make decisions about queries or protocols without having to refer up the line to Canberra, resulting in time delays.

## **C3. Jurisdictional and institutional arrangements**

There is a strong view among our members that a vacuum currently exists with regard to industry regulation.

AQIS has laid out standards for Semen Collection Centres but not for Semen Storage Centres or Embryo Collection Teams. It appears that AQIS does not see its role as a regulator or a developer of industry standards; however, it is its role to ensure that our industry complies with standards laid down by exporting countries.

NHIA has developed an industry accreditation program for Semen and Embryo Handling but there has been limited co-operation in this regard with AQIS.

Clearly, there needs to be a collective effort to develop a regulatory environment that provides confidence to the countries to which we export semen and embryos.

Equally, this collective approach could have benefit in the event of any import of genetic material with an unforeseen disease risk that develops after the granting of import permits. In other words, in the (admittedly unlikely) event that a comparable episode to Equine Influenza occurred in the bovine world, a collective industry response would be easier to organise.

The position of NHIA is that there needs to be a Nationally Recognised Representative Body set up for the Artificial Breeding Industry which comprises a committee/advisory body that would regulate the industry and provide policy input to AQIS.

As an example we would put forward the Canadian Livestock Genetics Association as an industry model that represents the best interests of all parties involved in the export and import of Canadian genetics.

#### **C4. Culture, efficiency and resourcing**

The staff at AQIS are hard-working and perform to the best of their ability with the resources they are given. The issue is that there does not appear to be enough of them to carry out all the required tasks in a timely manner.

Essentially, the experience is that pressure leads to staff turnover which results in policy and operational delays, inconsistency of interpretation and inefficiency.

#### **C5. Communication and Consultation**

Communication has been identified by our members as one of the primary issues for this review.

- Changes to veterinary protocols are made on the website without direct notification to the parties concerned.
- There is a perception that a lack of direct communication from AQIS limits the opportunity to comply of importers/exporters.
- Increasingly, routine queries are being referred to Canberra which results in costly delays.
- The industry does not feel that appropriate consultative arrangements exist between AQIS and importers/exporters.

## **Summary**

The breeding of cattle through AI has become a global phenomenon that has substantially changed the productivity levels of both the dairy and beef industries in Australia during the past two decades. The export of both dairy and beef products – our very competitiveness in a global sense - is dependent on the maximisation of genetic progress delivered through AI.

It is vital that AQIS is adequately resourced to take its place in the lead of this important area.

Furthermore, improvements can and should be made in the regulatory environment covering the Artificial Insemination industry to ensure that standards are clearly communicated, improved and maintained. Communication and co-operation can be improved for the benefit of all.

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