



A. P. F. A.

28th April 2008.

quarantinebiosecurityreview@daff.gov.au

Dear Sir/Madam

Submission on behalf of the Australian Prawn Farmers Association (APFA).
APFA appreciates the opportunity to input into this important review and looks forward to participation in future stakeholder meetings.

APFA represents the interests of Australia's Prawn Farmers aquaculture production with an annual turnover in excess of \$80 million.

APFA acknowledge that this review does not consider Australia's level of ALOP, however APFA would encourage AQIS to continue, if not strengthen this level of protection to ensure that Australia's unique natural environment remains disease free and uncompromised.

APFA and its members would urge AQIS to maintain the current ICON conditions in relation to imported uncooked whole or partially peeled prawns from all countries, in particular **condition C17926**, thus ensuring that uncooked whole or partially peeled prawns maintain the current status of significant risk to Australia. In fact APFA believe that this should be strengthened to include testing for Taura Syndrome Virus (TRV) – a more devastating disease that affects prawn farming worldwide.

APFA believe that maintaining these tight controls are in line with the recommendations of the 1996 Nairn Report – “Australian Quarantine – a Shared Responsibility” and that continued protection of Australia's unique natural environment must be maintained. Australia's status of freedom from contamination of exotic pests and diseases and the risks these can pose to human health, agriculture, forestry, fisheries and the environment warrants stringent protection.

APFA would support any changes that allow importation of aqua cultured products complying with the United Nations Food and Agriculture Organisation (FAO) 1995 Code of Conduct for Responsible Fisheries and also certification of the Social Accountability International (SAI) general standard for worker rights (SA8000).

Yours sincerely

Helen Jenkins.
Executive Officer.
Australian Prawn Farmers Association.