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Quarantine and Biosecurity Review Secretariat
Department of Agriculture, Fisheries and Forestry
GPO Box 858
CANBERRA ACT 2601

Dear Sir/Madam

Submission on behalf of the Queensland Seafood Industry Association (QSIA)

The QSIA appreciates the opportunity to provide a submission to this important review into Australia's Quarantine and Biosecurity provisions.

The QSIA represents the Queensland Seafood Industry which contributes approximately half a billion dollars annually to the Queensland economy.

The QSIA would like the following matters noted as issues of concern to our members and industry to ensure our industry remains disease free and uncompromised.

- The Import ban on Green Prawns to Australia remains and be strengthened
- The frequency of inspections is inadequate with current provisions not providing ALOP
- There remain a large proportion of seafood products entering Australia that is untested which represents an unacceptable risk to local seafood industry
- When a viral contamination is detected the QSIA is seeking to have any infringement pursued back to the source of the virus and not restricted to the importer
- The focus of any future Import Risk Assessment be prevention rather than the disease becoming established in Australia
- Neutral marinades such as olive oil and salt is insufficient to discourage their use as bait in recreational fisheries
- The current testing regulations for seafood are no deterrent to attempted importation of diseased product
- The high level of infection in overseas prawns is indicated by the high detection rate by AQIS in current imports, with up to 23% viral load in tail meat in heavily infected prawn.
- The annual risk assessment model is flawed -- because what may be a low risk in any one particular year will add to a higher risk over a period of several years -- and must be replaced by a system that takes account of the longer-term risk.

- There is a clear possibility of continuous cross-infection between aquaculture and wild fisheries once an exotic virus establishes itself in Australian waters.
- Disease outbreaks in wild fisheries are difficult to quantify or detect. Currently, it is difficult to quantify the impact of comparatively well-known influences, such as flood, drought and fish predation on prawn stocks. Disease would be a further confounding factor and difficult to assess (though, obviously, the impact could be devastating).
- Many other species of crustaceans also would be affected by exotic diseases introduced on imported prawn meat, with further potentially severe impacts in fisheries like the northern Australian mud crab fishery and the Australia-wide rock lobster fisheries.
- There would be serious socio-economic effects in wild fisheries and downstream industries, with serious consequences for regional economies and employment.
- Such exotic diseases would be impossible to eliminate once established.
- Managing such diseases is physically impossible in the wild fishery.
- The low price of imported prawns remains a strong incentive to use them as bait.
- There will be obvious incentives to label farm-sourced prawns as “wild caught”, possibly very early in the marketing chain, and this would be difficult to effectively police.
- Reliance on foreign product tracking could be unreliable, with concerns in particular about what might occur at the local or provincial level.

The establishment of diseases in Australian waters would add enormous cost and complexity to current domestic fisheries management arrangements, and may render some current management practices impractical or destructive to the economic wellbeing of Australian fishers.

The QSIA therefore seeks to have these matters considered as part of this review in an effort to better protect our seafood industries, in particular our wild fisheries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Green', with a stylized flourish at the end.

Neil Green