

# **Submission**

## **Towards a Recast National BJD Strategy**

**To:**  
**BJD Review Team Animal Health Australia**

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**Prepared by WAFarmers Federation**

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## **Agriculture in Western Australia**

The Western Australian Farmers Federation Inc. (WAFarmers) is the State's largest and most influential rural advocacy and service organisation. Founded in 1912, WAFarmers boasts a membership of over 4,200 farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$5.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land.

WAFarmers Federation welcomes the opportunity to provide comments to this preliminary discussion paper and looks forward to further engagement in this process.

### **WAFarmers comments to the first discussion paper on a recast national BJD strategy:**

1. Proposal:  
The updated national BJD strategy set aside any reference to a putative link between BJD and Crohn's disease until compelling evidence of such a link is brought forward.  
  
*Response:*  
*WAFarmers supports the aligning of this suggested "public health risk" with the management and control of BJD.*
  
2. Proposal:  
The updated national BJD strategy should treat BJD in a manner comparable to that which applies to the management and control of other endemic animal diseases.  
  
*Response:*  
*WAFarmers does not support this proposal. The discussion paper assumes that a common endemic disease is disease of animals throughout Australia rather than a disease that commonly occurs in a geographical region. BJD is not "endemic" to WA or to WA animals and consequently deserves to be treated in a similar manner as other diseases or pests that do not exist in WA. As such, further discussion with open and adequate surveillance is needed to better address the correct national picture in regards the prevalence of BJD management in Australia.*
  
3. Proposal:  
The updated national BJD strategy should significantly reduce (and ideally remove altogether) inconsistencies of approach between jurisdictions – inconsistencies that produce material disparities in the treatment of producers whose herds are touched by BJD, irrespective of geographic location.  
  
*WA Response:*  
*WAFarmers agree to this proposal in principle. As this is a National strategy, harmonisation of approaches between the jurisdictions would be ideal. However, this does not address the need in Western Australia to maintain low prevalence areas of disease, which is based on a*

*geographical location. All current WA movement conditions relating to BJD (with one exception – from QLD) are consistent with the national BJD program.*

4. Proposal:

The updated national BJD strategy should, in its next iteration, (a) maintain the separation between bovine and ovine Johnes disease and thus the separation of the associated management and control strategies; (b) acknowledge the risk of such cross-infections occurring; and (c) encourage the active management of the risks involved through biosecurity education and practice improvement initiatives.

*Response:*

*WAFarmers agree to this proposal. Further research is needed to determine the risk posed through cross infection of different strains and the transmission of a strain, for example S strain, between bovine to bovine. There is evidence to suggest that cattle can be infected with S strain, but more work is needed to determine the potential for cattle infected with S strain to shed sufficient quantities of organism to infect other cattle and sheep.*

5. Proposal:

The updated national BJD strategy should articulate a clear and crisp definition of its intent and focus by: (a) distinguishing disease management and control matters, which are its unquestioned remit, from trade-related imperatives, which will vary from one jurisdiction to another as well as by type of trade; and (b) giving trade considerations their due and proper place by explaining the link (and separation) between the two.

*Response:*

*WAFarmers agrees to this proposal. Where ever there are diseases of trade significance there must be clear distinction between disease management and control within jurisdictions, and meeting trade related compliance conditions to avoid losing market access. It is important that changes to the national BJD strategy should not compromise or be used as a barrier to trade by jurisdictions without rigorous scientific risk assessment and mature discussion to facilitate the final decision. By their very nature most disease control programs rely on zoning and movement controls based on epidemiological principles which may have trade implications. The true role of BJD in market access needs to be elucidated.*

6. Proposal:

The updated national BJD strategy should: (a) rest on a basic tenet and default position of self-determination for producers whose herds are BJD-affected; (b) guide and assist producer self-determination through science-based, jurisdiction consistent and trade-adjusted pathways that, if followed, allow producers to manage and control BJD in their herd; limit the spread of the disease (typically as part of biosecurity practices); and, most importantly, allow the producer to manage his or her future with neither penalty nor stigma.

*Response:*

*WAFarmers suggest this proposal needs further clarification and discussion. At present it is proposing that the management and control of BJD should be deregulated, and a producer of a BJD affected herd should be able to take responsibility for the control and management of BJD without regulatory impacts, penalties or stigma. The realities dictate that there will be penalties regardless of disease regulation when taking into account trading cattle to different markets. How producers manage this as a deregulated disease would rely on an effective industry program assisted by government jurisdictions along clearly defined roles and responsibilities. Industry and Government need to agree firstly on whether BJD should be*

*nationally deregulated. After this has been decided, this proposition can then be discussed. Producers in WA have indicated they would like to maintain its BJD free zone.*

7. Proposal:

The updated national BJD strategy should: (a) recognise the producers (rather than regulators) as owners and managers of the BJD risk in their herd(s) irrespective of jurisdiction – and thus obviate the need for the zone system in a scheme designed for disease management and control (rather than trade); (b) have government resources (including CVOs) and industry assist producers in managing the risk of BJD manifesting in a herd through biosecurity-driven education; (c) have government resources (including CVOs) and industry assist producers in managing the disease, should it manifest nonetheless; and (d) have government resources (including CVOs) and industry support producers' viability through the use of trading pathways that recognise export trading requirements where appropriate.

*Response:*

*Again this is suggesting the control and management of BJD should be deregulated and give producers and industry ownership of BJD control and management. It is effectively stating that zoning and the low prevalence areas should be abolished which is not supported by some sectors of industry.*

8. Proposal:

Consistent with the producer, property and herd-focussed principles enunciated earlier, the updated national BJD strategy should rely on a producer-centric responsibility structure (a) in which, in ordinary circumstances, producers are required to satisfy authorities, through independent testing, as to the fitness of their herd (or property) for the trade in which they propose to engage, particularly where export trade is concerned; and (b) in which the role of the authorities is to verify that testing and certification, and conduct supplementary, risk-based audits as they see fit; generally, provide assistance and support to producers in understanding and fulfilling the conditions that apply to the type of trade in which they wish to engage; and, where BJD manifests, to assist affected producers in maintaining such operating capacity as is open to them under the regulations governing the trading that can take place in their circumstances.

*Response:*

*This again is stating that the control and management of BJD should be deregulated and give producers and industry ownership of BJD control and management.*

**In Summary:**

WAFarmers believes it is neither achievable nor necessary to get complete national consensus on how to manage BJD because in the end each jurisdiction will impose their own rules through their respective legislations.

We are concerned the timetable for changes to be implemented is slipping.

The paper appears to support national deregulation without considering the needs of low BJD prevalence areas. It portrays the current situation as gross over-regulation without considering the benefits to those producers in the current low prevalence areas.

It also does not deal with what effect a nationally deregulated BJD environment would have on export markets, which is of importance to the Western Australian livestock industry.

Finally, the discussion paper does not take into consideration a review of the compensation arrangements needed to support businesses currently under restrictions for BJD, particularly given the long term implications of these restrictions on businesses.