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4 May 2015

Mr Duncan Rowland  
Executive Manager Biosecurity  
Animal Health Australia  
Suite 15, 26 Napier Close  
DEACON ACT 2600

Dear Duncan

### **First Discussion Paper on a recast National BJD Strategy**

The dairy industry welcomes the opportunity to contribute to the stakeholder consultation concerning the view of the National Bovine Johne's disease Strategy. This is a joint submission from the Australian Dairy Farmers Limited (ADF) and Dairy Australia on behalf of the Australian dairy industry.

The ADF is the national peak policy body for the Australian dairy farmers on issues of national and international importance. Dairy Australia is the dairy industry-owned service company, limited by guarantee, whose members are farmers and industry bodies, including the ADF and the ADPF.

The dairy industry supports the need for change to the present strategy. It is recognized that the First Discussion Paper which draws on views and information provided as part of the wider consultation process explores assumptions and approaches for a revised BJD Management Strategy. As an initial start to the process the Discussion Paper does not cover all matters that will be necessary before resolution of the Propositions that have been presented in this Discussion Paper.

In particular, the First discussion Paper tends to focus on the management of BJD on affected properties and the need to fulfil trade imperatives as a major driver for the BJD Management Strategy is underplayed. The dairy industry agrees that evidence has not been presented to confirm a causal link between Crohn's disease and *Mycobacterium paratuberculosis* infection yet there continues to be international pressure and the perception of public health consequences can also dramatically affect trade. This perception of a link is an important matter that must not be set aside in the development of a recast National BJD Strategy because the management of BJD underpins a precautionary food safety approach that supports the reputation and integrity of Australian produce.

The Discussion Paper provides the expressed views clearly and proposes that the general features of the recast strategy – should be open, consistent, science-driven, risk-based, producer-empowering, and voluntary participation in disease containment, meets trade imperatives and has light regulatory impact. The summary statement refers to being demonstratively consistent with itself and with the treatment of similar diseases.

*The dairy industry notes that consistency with the management of similar diseases may be desirable but diseases with different features (control options) and different trade risks may require different management strategies.*

### **Specific objectives of the recast BJD Strategy:**

The Discussion Paper proposes setting aside consideration of links between BJD and Crohn's disease.

*The dairy industry believes this may be difficult and is not appropriate because the potential link is a major factor contributing to the trade imperatives to manage BJD.*

The Discussion paper proposes removing differences (interpretation/discrepancies) between jurisdictions with simpler uniform approaches and measures.

*The dairy industry agrees this is valid and desirable but it fails to recognise that there may be different objectives or risks requiring different strategies to meet united national objectives. The proposed specific objectives fail to recognise a need to provide support to producers and markets that desire to prevent or minimise the introduction of BJD or M. paratuberculosis infection with purchased livestock.*

#### **Four fundamental propositions** (*Dairy industry comments and views are shown in italics*)

1. Set aside reference consideration of links between BJD and Crohn's disease.

*This will not protect markets when others make claims promoting the similarities between the diseases and result in adverse trade impacts. This is an important imperative for the strategy.*

2. Consistency of Approach. BJD to be treated the same as other endemic diseases.

*Incorporating BJD management and control in an overall biosecurity framework is sound but if the features of the diseases and the objectives for management are different then different approaches may be relevant.*

3. Consistency of application between jurisdictions.

*This is desirable for a national strategy but it may remove an opportunity to act for the collective common good of sub-groups desiring to protect a low risk status and support market access.*

4. Strains of *M. paratuberculosis* to be managed separately whilst acknowledging risk of cross-infection.

*This proposition will require consideration of the risks to trade from infection with *M. paratuberculosis* compared to risks of BJD (disease) and possibly the specifics of managing cattle infections on OJD affected properties.*

#### **Four propositions in regard to operational matters**

1. Distinguishing disease management and control priorities from trade priorities.

*There seems to be some confusion as what are the trade imperatives (to meet the requirements of purchasers and markets) that stock and livestock products (to be fit-for-purpose) are usually directed towards minimising spread or introduction of infection. These trade imperatives have been the major driver for BJD management and control objectives and need further consideration in the recast strategy development.*

2. Rebalancing regulator/producer responsibility, includes the role of quarantine and disease tracing and supports self-determination allowing a range of trading options.

*This proposition is mainly concerned with a focus on affected producers and there appears to be little support for producers seeking to prevent or minimise the risk of introduction of infection.*

3. Territorial constructs, envisages removal of the zone system with responsibility for management of BJD risk transferred to producers irrespective of jurisdiction, with industry and government assistance through education, disease management and trade support.

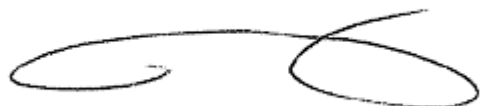
*The current zone arrangements provide protections and assurances greater than the proposed education assistance, particularly for wider stakeholder interests from unintentional or deliberate failure to observe recommended practice.*

4. Export trade requirements, the proposition appears to focus on testing to meet obligations

*The constraints of testing have been acknowledged and it would be appropriate to also include other assurances such as absence of clinical disease.*

The dairy industry looks forward to participating in the ongoing consideration and development of a recast BJD management strategy.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized loop on the left and a smaller loop on the right, connected by a thin line.

David Losberg  
Senior Policy Director  
Australian Dairy Farmers Limited

A handwritten signature in black ink, starting with a large 'R' followed by 'Condron' in a cursive script.

Robin Condron  
Manager Animal Health and Welfare  
Dairy Australia