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Mr Duncan Rowland
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Dear Duncan

Second Discussion Paper on a recast National BJD Strategy

The dairy industry welcomes the opportunity to contribute further to the stakeholder consultation concerning the review 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 dairy industry supports the progress with consultation to recast the BJD strategy. The Second Discussion Paper builds on the earlier work and attempts to clarify aspects and provide more direction. There continue, however, to be some areas of confusion and recommendations that have not adequately addressed matters on which the dairy industry made comment in earlier submissions.

The **High Level Principles for the Review** have been refined and appear to be sound. It is suggested that the purpose or need to manage BJD should be elaborated and included in these principles. A consistent approach with other similar diseases is sought, but there is little recognition that diseases with different features (control options) and trade risk may require different management strategies. The health and welfare of dairy cattle is priority for dairy farmers and it is an additional reason to minimise the impact of BJD.

Three Primary Objectives (section 14) have been introduced for the recast approach to manage the disease. These appear suitable but they do not include aspects of the key goals and objectives of current strategy that may still be appropriate and warrant further consideration. In particular, to minimise contamination of farms and farm products by *M. paratuberculosis*, and to protect non-infected herds whilst minimising disruption to trade.

Ancillary Objectives (section 15-20) These are straightforward and relevant.

Regulated and Deregulated Regimes (section 21-29) Recommendations include aligning the status of BJD closer to that of other cattle diseases. In terms of supporting general biosecurity principles this is sound but the detail and imperatives to manage BJD may require modified approaches to ensure that the approach is fit-for-purpose.

Johne's disease and Crohn's disease (section 30-35) notes differences between association and causation and recommends a 'watching brief' on evidence for possible links. The recommended 'watching brief' is supported but dairy industry comments on the First Discussion paper seem to have been overlooked. The limited perspective afforded to managing potential consequences for markets due to public health/food safety concerns that may arise (real or perceived) contrasts with this being a major driver for the dairy industry to take action to manage BJD.

The suggested approach doesn't include key management strategies that need to be taken to minimise human exposure to *M. paratuberculosis* in food as a precautionary measure if at some future stage evidence confirms a direct link or if consumers/customers perceive this is a significant risk. We recommend that in addition, the recast strategy should indicate what is being done to protect market access.

For example:

Continue to minimise the contamination of farms and farm products by maintaining a low prevalence of BJD and;
Excluding cattle with clinical BJD from the food chain.

Strain Diversity (section 36-42) proposes that infections of cattle with all strains of *M. paratuberculosis* be managed similarly. Here the paper continues to confuse infection with *M. paratuberculosis* and disease and it does not recognise differences in the epidemiology and pathogenicity of the different strains. The different strains do not produce the same effect in infected cattle. This is important if the objective of the recast BJD strategy is to manage disease rather than prevent the spread of infection. Para 39 clarifies that export regulations do not distinguish between strains of *M. paratuberculosis* however eligibility for export is dependent on the absence of clinical cases of BJD which is more significant for access to export trade than a negative test result. Whilst recognising that all strains may infect cattle their significance and strategies for their management may be different.

Zone construct and Risk management (section 43-60) proposes doing away with the zone construct but recognises continuing need for risk management and assurances to underpin risk-based trading. The first paragraph of the introductory context again confuses disease and infection and should be; *'The question of protection from incursions of infected cattle (as distinct from the management of disease) is at one and the same time a desirable goal'*.

Additional elements of a risk management framework that could be recognised in Paragraph 57 are:

The biosecurity management practices including in regard to introductions to the herd; and
The occurrence and investigation of cattle with suspect signs of BJD.


It would be relevant for Paragraph 58 which outlines principles of the national system to also include; *'provision of support for a reliable exchange of information to underpin risk-based trading'*.

Notifiability, Monitoring and Surveillance (section 61-69) clarifies the significance and role of requirements for notification and recommends that the operation of market assurance programs be revised in the recast strategy. This is strongly supported by the dairy industry because arrangements for market assurance are currently not operating efficiently and they are not meeting industry expectations. Recommendations from previous reviews of the MAP have not been implemented.

Research and Development (section 70-75) recommends continuing research that supports the recast strategy. This is supported and needs to include relevant attention to extension in the RD&E spectrum.

The dairy industry looks forward to continuing participation in the ongoing development of a recast BJD management strategy.

Yours sincerely



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