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Mr Duncan Rowland
Executive Manager Biosecurity
Animal Health Australia
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Dear Duncan

BJD Framework Document for the new approach to the management of Johne's disease in cattle

The dairy industry welcomes the opportunity to contribute to the development of a fresh approach to the management of Johne's disease in cattle following 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 notes the widespread consultation that has taken place and recognises that there is support for a less regulated approach to manage Johne's disease in cattle.

The BJD Framework Document outlines fundamental objectives and general principles for the new approach which are supported by the dairy industry. This is a high-level framework that is coherent and risk-based. The new approach is flexible and attempts to make provisions and support for producers to take control according to their business needs. It also provides for groups of producers with similar status and needs to make collective biosecurity arrangements. Such groups may seek assistance from jurisdictions for implementation of these arrangements.

The recast National BJD Management Strategy has been presented as a part of a new Management Plan for Cattle Production Conditions. At this stage there is no provision in the Management Plan for any other endemic diseases of cattle and these will need further consideration to determine priorities and strategies for relevant sectors and conditions.

While supporting the general principles of the BJD Framework Document the dairy industry notes that many details required for implementation of a new strategy have not been developed or resolved. In particular, the dairy industry is concerned that considerable work will be required to develop the proposed tools and operational details, such as the funding arrangements and the communication needs and strategy. It would appear that the initial February 2016 target for implementation of the new strategy may be unrealistic and needs to be reviewed given the scale and scope of the proposed changes and the need to prepare tools, programs and communicate with, and educate, farmers on the new regime. ADF and Dairy Australia recommend that consideration be given to transitional arrangements that facilitate the above.

Specific comments on BJD Framework Document

While supporting the general principles and approach of the recast strategy the dairy industry is concerned about some of the specific elements outlined in the BJD Framework Document as follows:

The document recognises that substantial education and communication effort will be required to assist producers and stakeholders with the implementation of the strategy (**Para #13**). Further development will

be required for the communication needs and how they are to be delivered. The dairy industry believe it is premature to resolve that education and communication will all be channelled through Animal Health Australia as proposed in Paragraph 13.

The document suggests that funding will be sought for a range of activities (**Para #14**). The dairy industry notes that for the proposed activities different sectors and/or jurisdictions are likely to have different requirements, priorities and capacities that will need to be accommodated in funding arrangements.

The dairy industry supports the provision of suitable risk assessment and decision support tools (**Para#28**). The existing National Dairy Industry BJD Assurance Score (Dairy Score) will be revised and modified by the dairy industry to provide guidance to dairy farmers about how to improve the assurance status of their cattle and to assist risk communication between vendors and buyers of cattle. The revised Dairy Score will provide dairy producers with a simplified alternative to the Cattle MAP for high-level assurance (low risk) cattle.

Information should be available to all farmers for risk-based trading and in addition to the Dairy Score dairy farmers will require similar decision support tools when proposing to introduce animals from non-dairy producers. Risk profiling tools for other industry sectors will need to account for different risks, husbandry practices and biosecurity measures available to manage infection with *M. paratuberculosis*. These new risk profiling tools will need to have provisions for a full range of assurance/risk including for all strains of *M. paratuberculosis*.

It is proposed that the Cattle Health Statement will be enhanced (**Para#29**). For the dairy industry the Cattle Health Statement may be a suitable vehicle to communicate the Dairy Score however the dairy industry has reservations about the effectiveness and reliability of the Cattle Health Statement for widespread adoption and communication of biosecurity information. Producers in different sectors and regions have different biosecurity requirements when purchasing animals and the proposed cover of a range of health issues with relevant information by Yes/No responses may be unrealistic. The dairy industry have previously recommended declaration of the Dairy Score in the Other Information Item of the National Vendor Declaration.

The dairy industry seeks further clarification of the proposed regulatory support for an animal health declaration (**Para #29**) when the principles of the new approach is for a reduced regulatory burden.

The current JD Cattle MAP is to be reviewed and alternative assurance tools will be developed (**Para #32**). It is proposed that the present JD Cattle MAP requirements will remain in force until an alternative is introduced (**Para #33**). The dairy industry notes that the verification requirements of the JD Cattle MAP are currently 'on hold' pending the outcome of the review of the National BJD Strategy and a decision will be required on whether these are reinstated or disbanded.

The dairy industry accepts that distinctions between infecting strain (B, S or C) are not relevant to the risk associated with presence of *M. paratuberculosis* infection in a herd (**Para #35**), however, the expression of disease may differ with different strains and alternative biosecurity management measures are likely to be applicable.

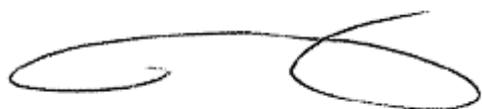
The framework document suggests that trace-forwards and trace-backs by producers will be encouraged (**Para #47**). There is no explanation of what purpose this requirement will serve or how the outcome will be achieved in practice. The dairy industry is concerned that the proposed approach will be unworkable in any practical sense and recommends that this requires further consideration and deliberation.

The framework document recognises that producers may wish to achieve higher levels of quality assurance (**Para #52**) but only refers to additional monitoring of herds. The dairy industry believes that higher levels of quality assurance are achieved by the adoption of appropriate biosecurity measures and that the role of monitoring is a means of verifying these biosecurity practices.

ADF and Dairy Australia will continue to consult with State dairy farming organisations and jurisdictions, and work together on developing, refining and finalising the revised Dairy Score.

We are also keen to assist and contribute to the development of the detailed arrangements for the new approach to manage BJD including the resolution of the issues that have been outlined in this submission.

Yours sincerely

A handwritten signature in black ink, consisting of two large, overlapping loops.

David Losberg
Senior Policy Director
Australian Dairy Farmers Limited

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

Robin Condron
Manager Animal Health and Welfare
Dairy Australia