



17 September 2020

Beth Cookson
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Department of Agriculture, Water and the Environment
Biosecurity Animal Division
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Dear Beth,

WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: IMPORT RISK REVIEW FOR PSITTACINE BIRDS FROM ALL COUNTRIES – DRAFT REPORT

Thank you for the opportunity to comment on the Import risk review for psittacine birds from all countries – draft report (the Draft Report). Provision of input and or comment on import risk assessments (IRAs) and the IRA process have historically been out of scope for WHA. We make an exception in this case due to concerns raised by a number of WHA members regarding the Draft Report. These concerns appear to be consistent across those organisations and individuals that have provided comment and are therefore provided here for your consideration.

The overall sentiment was that any resumption will almost certainly increase exposure and that as a nation we have sufficient challenges with disease management in our captive and native psittacine species without a potential further increase through resumption of imports.

We suggest additional activities that could be considered in reviewing the risk assessment including: consultation with ecologists and greater emphasis on consequences to endangered species; recognition of the limitations of disease testing; recognition and consideration of criteria for nationally significant diseases as outlined in the NEBRA and intersection with the Priority List of Exotic Environmental Pests and Diseases, and; further consultation with potentially heavily impacted states and territories.

Additional mitigation measures are also suggested including inclusion of diseases of concern into national preparedness, surveillance arrangements and a register of imported birds verified by DNA passport. Both of which should be in place prior to any decision being made to go ahead.

We recognise the very good job you and members of your department do in facilitating trade whilst also protecting Australia in this area in what is often a very difficult and thankless task. I'm sure the views on this one are particularly polarised!

Thank you again for the opportunity to comment.

Rupert Woods AM
CEO, Wildlife Health Australia

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SUMMARY OF COMMENTS RECEIVED

Risk and consequence assessments in some cases do not appear to align with the evidence presented

Concerns relate mostly to impact upon endangered species, which in general appear to be scored lower than might be expected. For example:

- Avian paravulavirus-3 is identified as of particular concern for *Neophema* species, however its overall risk rating is very low. Incursion and establishment in, for example, a captive breeding colony of orange-bellied parrots (a *Neophema*) would likely be catastrophic for this critically endangered species e.g. the effect is likely to be significant (possibly highly significant) at the national level and highly significant within affected zones as per Table 1 “Rules for determining the overall effect of establishment and spread”.
- Similarly, for psittacine poxvirus the risk of establishment is considered high with the potential to cause severe disease, yet the impact at a national level is considered to be minor. It could be argued that establishment in for example, the endangered swift parrot, could also be catastrophic, and again with the effect likely to be significant (possibly highly significant) at the national level and highly significant within affected zones.

Concerns regarding effectiveness of pre-screening and exclusion testing used as part of the assessment

A pervading theme of the Draft Report is around the inadequacy of testing for many of the diseases of concern. Yet the importance of this in assessment is regularly downplayed. For example:

- There are challenges around testing for avian bornaviruses (poor test sensitivity with many false negatives, prolonged incubation period, lack of serology capability in Australia) the introduction and establishment of which in endangered species would also likely be catastrophic.
- Use of tests for mitigation / risk management where sensitivity and specificity are either not known, false negatives occur frequently, or an inappropriate test is recommended (e.g. swabs vs blood collection).
- The lack of consideration of unknown diseases in the assessment. Though diagnostic techniques have improved since the 90’s, new molecular techniques are constantly detecting previously unreported or identified viruses. The episode with the green-winged macaws was a salutatory lesson for Australia: there is no reason why it would not be repeated in future for other, currently unknown diseases, possibly with greater consequences, and despite the evolution of testing techniques.
- Further consultation with avian molecular diagnosticians is indicated as is reassessment of post entry testing durations and protocols.

Exclusion of assessment of sub-types and strains of diseases known to currently occur within Australia in the assessment

The assessment excludes diseases known to be present in Australia. However, many of these diseases have sub-types or strains not known to be present and to be of potential pathogenicity, for example some exotic

strains of beak and feather disease, a disease which is listed as a key threatening process in some species of psittacines in Australia.

Concerns regarding the recommendation of risk mitigation measures based on risk rather than consequence

It is likely that the states may also take measures and or institute controls and this needs to be considered. For example, large amounts of public money have been invested in recovery programs for orange-bellied parrots. Though the risk identified from some of the diseases assessed is considered low, to very low, the potential consequence (contrary to the assessment) is potentially very high, and may, in fact constitute a stochastic event should one or more of the diseases of concern establish in one or more of these endangered species. Consultation with Tasmania and Victoria is indicated.

The lack of ability to effectively trace and monitor the health of birds once released into the community

A significant consideration in risk management is the ability to identify and trace animals post arrival. A significant, positive, risk-management treatment would be the re-instatement of a national register of imported birds verified by DNA passports. The cost should not, however, be underestimated. Many of these birds are long lived and would need to be tracked for the duration of their lifetime. Assumptions around reporting would also need to be tested. Use of post arrival tracking for risk management relies on the behaviour of bird owners in reporting. For this to be successful, there would need to be a significant outreach component and potential compliance-type function for the states. A risk-maker, cost recovery-type funding model could be applied.

Intersection with other agreed priority lists, processes for assessment and prioritisation and public communication

Australia is currently going through an exercise to identify pests and diseases of national significance to Australia's environment (the Priority List of Exotic Environmental Pests and Diseases: Priority List). One of the lists that has been generated is for native animal diseases and their pathogens. After exhaustive review, three of the five diseases of most concern in our native animals have been identified to involve psittacines:

- Exotic West Nile virus (other than WNV lineage 1b (Kunjin virus))
- Pacheco's disease and internal papillomatosis disease (Psittacid herpesvirus-1)
- Proventricular dilatation disease (Parrot bornavirus (PaBV)).

To the casual observer, unaware of the risk assessment process, it would seem unusual to have identified these diseases to be of such importance, but to then rate the risk they pose from the importation process to be so low. Very careful consideration will need to be given to release and communication of the findings of the Draft Review to stakeholders once finalised should a decision be made to resume imports.

The role of the Priority List in driving surveillance activities for these diseases as another possible risk mitigation measure also needs to be considered. Incorporation of diseases of concern into national surveillance activities and the development of contingency or response plans for each could also assist in managing risk and public concern. This could also be cost recovered through a levy on imports should a decision be made to resume imports.

Concerns regarding a lack of response options and action should establishment occur

A number of members have reminded us of the lack of political will and effective tools to respond should diseases establish in wild populations. Examples used were for an invasive species of non-psittacine, rock doves (feral pigeons) and pigeon paramyxovirus, reovirus in pigeons and no structured follow-up to the diagnosis of psittacine herpesvirus in green-winged macaws in the 90s.

Our national arrangements for response to environmental weeds, pests and diseases have, however, come a long way since the 90s. Wildlife health incidents are now actively investigated and pursued in all of Australia's states and territories, including Australian Antarctic Territory as part of Australia's wildlife health surveillance system. We also now have the National Environmental Biosecurity Response Agreement (the NEBRA), which allows relevant authorities to commit funding and undertake actions to respond to diseases in wildlife deemed to be of national significance. However, though a significant achievement, the NEBRA has not yet been tested for wildlife and a significant impediment to its activation for the wildlife area is a lack of an agreed process for benefit cost analysis. The NEBRA thus offers some comfort but will only be truly effective once this, and the last few issues are ironed out. Completion of these task needs to be a very high priority, and preferably should be in place prior to any resumption of imports.

In reviewing the Draft Review, it may also be wise to assess the diseases for inclusion with consideration of the agreed criteria for national significance as outlined in the NEBRA and the criteria used to develop the Priority List. As for the Priority List (above), in communicating the final decision of the Department careful consideration will need to be given to any required consideration or alignment of language with the NEBRA should a decision be made to go ahead.

Other concerns raised with us

There has been some discussion within our membership regarding reinstating importation and management of illegal smuggling. The main argument being that this would facilitate a more orderly entry and reduce the risk that other diseases might come in. Though views were mixed, many believed that reinstatement would in fact, rather than improve compliance, increase the incentive and ability to launder animals into the system because of cost and a lack of monitoring and compliance activities post release from quarantine. However, the main issue remains as illegal smuggling of animals and eggs out of the country rather than into it. This is mentioned here for completeness.

Though out of scope, concerns were also raised regarding the renewed importation of species recognised to either compete or cross-breed with native species. For example, the two most invasive species of parrots globally are the Quaker Parrot (*Myiopsitta monachus*) and Indian ringneck parrot (*Psittacula krameri*). Both are already being bred extensively in Australia and the latter included on the List of Specimens taken to be Suitable for Live Import into Australia. Renewal of import arrangements may not only put endangered species of Australian psittacines at risk, but also facilitate entry of known invasive species. Have ecologists been involved in assessing ecosystem impacts (or, in fact, the disease impacts on species and ecological systems themselves)?

ABOUT WILDLIFE HEALTH AUSTRALIA

[Wildlife Health Australia \(WHA\)](#) is the coordinating body for wildlife health in Australia and operates nationally. The head office is located in Sydney, NSW.

WHA activities focus on the increasing risk of emergency and emerging diseases that can spill over from wild animals and impact on Australia's trade, human health, biodiversity and tourism. We provide a framework that allows Australia to better identify, assess, articulate and manage these risks. We provide the framework for Australia's general wildlife health surveillance system.

Our mission is to develop strong partnerships in order to better manage the adverse effects of wildlife diseases on Australia's animal health industries, human health, biodiversity, trade and tourism.

WHA directly supports the Animal Health Committee (AHC), Environment and Invasives Committee (EIC), Animal Health Australia (AHA), the Animal Health Policy Branch and the Office of the Chief Veterinary (OCVO) and Environmental Biosecurity Officers (CEBO) within the Australian Government Department of Agriculture, Water and Environment (DAWE) and Australian governments in their efforts to better prepare and protect Australia against the adverse effects of wildlife diseases. WHA provides priorities in wildlife disease work, administers Australia's general wildlife disease surveillance system as well as facilitating and coordinating targeted projects. Wildlife health intelligence collected through the National Wildlife Health Information System (eWHIS: <http://www.wildlifehealthaustralia.com.au>) administered by WHA is provided to members of AHC and the Australian Government DAWE and Department of Health (DoH) on issues of potential national interest, potential emerging issues and significant disease outbreaks in wildlife. The information is provided in line with the agreed policy for data security. WHA supports the National Animal Health Information Program and National Animal Health Information System (NAHIS) by provision of quarterly reporting and the ACVO by hosting the OIE Wildlife Health Focal Point and IUCN Vet Specialists Group representative.

WHA is administered under good organisational governance principles. An elected management group, chaired by an appointment from DAWE, and including an AHC representative provides strategic direction and advice to a small team, which oversees the running of WHA. It is important to note that WHA involves almost every agency or organisation (both government and NGO) that has a stake or interest in animal and wildlife health issues in Australia. There are more than 30 member organisations and 650 wildlife health professionals and others from around Australia and the rest of the world who have an interest in diseases with feral animals or wildlife as part of their ecology that may impact on Australia's trade, human health and biodiversity.

More information on WHA is available at: <http://www.wildlifehealthaustralia.com.au>.