# Review of the biosecurity risks of prawns imported from all countries for human consumption

Pre-release information session

30 May 2023

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**Acknowledgement of Country**

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

## Foreword

The Department of Agriculture, Fisheries and Forestry hosted an online pre-release information session about the final report for the *Review of the biosecurity risks of prawns imported from all countries for human consumption* (the prawn review). There were over 60 participants from key stakeholder groups including the Australian Prawn Farmers Association (APFA), the Australian Council of Prawn Fisheries (ACPF), the Seafood Importers Association of Australasia (SIAA), the Food and Beverage Importers Association (FBIA), and Australia’s states and territories.

This document provides answers to questions that were not answered during the pre-release information session. Further information about the prawn review can be found on the department’s website on the [Background: prawn and prawn products review](https://www.agriculture.gov.au/biosecurity-trade/policy/risk-analysis/animal/prawns/background-prawn-products-review) webpage.

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## Questions and answers

Responses to questions that were not answered during the pre-release information session.

### Biosecurity measures

[Question 1]

My questions are always around context. After the most serious aquatic disease incursion how can we continue as a country to have states imposing different ALOP to the Federal government at the detriment of Australia’s industries.

[Answer 1]

Domestic movement controls are put in place at the discretion of the relevant state or territory governments and are a matter for their consideration. The Australian Government would support measures other than cooking for movement of domestic product within Australia, providing the measures were equivalent to those at the border. The choice of measures depends on a range of factors including, infrastructure, feasibility and cost. Some measures appropriate for international trade are not feasible or affordable for trade between states and territories.

[Question 2]

Bait usage is a risk - good to hear that acknowledged, so why not apply stronger measures to minimise risk further at the import interface (instead of passing the risk onto the industry, states and territories to mop up the messes).

[Answer 2]

The department considered the likelihood of prawns and prawn products being used by recreational fishers as bait when conducting the prawn review. Because of the reported usage of prawns as bait, the department applies import conditions for prawns and prawn products to manage the risks of imported prawns to a level which achieves Australia’s appropriate level of protection (ALOP). Australia’s ALOP is described as providing a high level of protection aimed at reducing risk to a very low level, but not to zero. As a member of the World Trade Organization (WTO) and as a partner in free trade agreements, Australia has obligations to apply biosecurity measures only to the extent necessary to protect human, animal or plant life or health. Therefore, applying stronger measures than those identified as being required through the biosecurity risk assessment process, would be inconsistent with Australia’s international obligations.

[Question 3]

Given whole genome analysis of the WSSV detected in NSW is not a highly divergent strain that would be expected for an Australian endemic strain, and implies exotic origin - why were no additional measures considered necessary following this detection?

[Answer 3]

The department considered the available information about the outbreak of white spot disease in New South Wales and was of the view that it did not materially affect the conclusions in the prawn review.

[Question 4]

From Inspector-General of Biosecurity 2017, Uncooked prawn imports: effectiveness of biosecurity controls, 10.1 Revising prawn import conditions - The IGB report said: " The prawn-farming industry has long argued for limiting the entry of prawn products to cooked product only. This would help protect Australia from WSD and other prawn diseases. And it would be in line with Australia’s requirement that pork and most other meat imports are cooked before final release into the market, unless the exporting countries are demonstrated to be free of specific serious exotic diseases." So why don't you adopt this policy position?

[Answer 4]

Australia applies its appropriate level of protection (ALOP) in a consistent way across all products (that is, aquatic animal, terrestrial animal, and plant products). As unique risk factors, consequences and scenarios apply to each product, those risks are managed in different ways to ensure that Australia's ALOP is met. Therefore, different import conditions may apply for different commodity types. Importantly, biosecurity measures are selected based on whether they reduce risk to a level that achieves Australia's ALOP. Whilst cooking is an acceptable risk management measure to manage diseases of biosecurity concern, a range of other measures may be acceptable to reduce risk to achieve ALOP. Whilst cooking does manage the biosecurity risks for prawns and terrestrial meat products, so do a range of other biosecurity measures. As an example, fresh meat products from terrestrial animals can be exported to Australia with the appropriate risk management measures. In the case of prawns, and many other commodity types, Australia’s biosecurity measures are more stringent than those recommended by the World Organisation of Animal Health, this is because they are supported by scientific risk assessments.

### Risk analysis

[Question 5]

In summary: 1 in 100 uncooked prawn shipments entering Australia have white spot. In a survey, 7% of fishers ADMITTED TO using green prawns as bait. There are 4.2 million recreational fishers. That's AT LEAST 300,000 potentially contamination opportunities throughout Australia potentially destroying our commercial wild catch prawn fisheries and aquaculture sector. You think this acceptable risk?

[Answer 5]

There is no evidence to support the statement that one out of every 100 batches of uncooked prawns released from biosecurity control are infected with white spot syndrome virus. The department undertakes a range of activities to verify that Australia’s current import conditions for prawns are being met, and to provide assurance that ongoing trade achieves Australia’s appropriate level of protection (ALOP). One of these activities is WSSV testing of imported prawns purchased from Australian retail outlets. Of 401 samples of prawns taken from the three rounds of retail sampling conducted since 2018, only one has returned a positive result for WSSV. All batches of prawns which are found to be positive for white spot syndrome virus during on-arrival testing are exported or destroyed and are not released from biosecurity control. The department considered the likelihood of prawns and prawn products being used by recreational fishers as bait when conducting the prawn review. Because of this reported usage, the department applies import conditions for prawns and prawn products to manage the risks of imported prawns to a level which achieves Australia’s appropriate level of protection (ALOP) and recommends that seafood imported for human consumption is not used as bait.

[Question 6]

Do you realise that for CMNV and DIV-1, by relying on the "Emerging Disease testing program", the ALOP being applied is lower than was applied by the 2009 IRA, which allowed entry of WSSV within 7 years (= 1 in 7-year chance). This demonstrates that your Department does not plan to meet Australia's ALOP for these known diseases as a 1 in 7-year risk is a moderate to high risk, not "Very Low".....

[Answer 6]

The department used a risk assessment methodology consistent with that recommended by the World Organisation for Animal Health when conducting the assessments for each hazard in the prawn review. As is required under our international obligations, Australia’s appropriate level of protection (ALOP) is applied consistently across and within risk assessments conducted by the department. Estimation of entry likelihood considers, amongst other factors, the expected prevalence of the hazard in the imported commodity. Covert mortality nodavirus (CMNV) and decapod iridescent virus 1 (DIV1) were not detected during monitoring programs undertaken during 2020–22 in deveined, de-headed and de-shelled prawns. These programs included targeted sampling of batches from countries where these hazards are endemic. Given the known prevalence in imported prawns, it was appropriate to consider this information when estimating the entry likelihood. The prawn review recommends ongoing monitoring of imported batches for these two emerging disease agents to monitor the entry likelihood of these emerging diseases so additional biosecurity measures can be applied if necessary.

### The bait and berley survey

[Question 7]

As outbreaks have only been detected near prawn farms, perhaps the focus of the bait survey should be in regional areas near those farms. That is the risk environment under threat. Can the demographics be filtered to show % of imported human consumption prawns usage in these at risk areas?

[Answer 7]

The sampling method for the 2019–20 bait and berley survey was designed to achieve a representative sample of all types of recreational fishers across Australia. The bait and berley survey report shows usage at a national, and state and territory level. Additionally, the proportion of recreational fishers that recalled seeing advice against using imported prawns as bait, by demographic is available in the report. Respondents in regional areas had greater awareness than respondents from major cities. In addition, awareness increased with fishing avidity (days fished per year) and males had greater awareness, than females. However, the report does not include further demographic breakdowns.

### Compensation

[Question 8]

Will the new biosecurity levy be used to compensate prawn fishers and aquaculture when your risk management framework allowing green prawn imports inevitably fails and white spot incursions continue to occur?

[Answer 8]

Compensation for aquatic animal disease outbreaks and the new Biosecurity Levy are outside of the scope of the prawn review. Information regarding sustainable funding for a strong biosecurity system can be found here. As recommended by the Inspector-General of Biosecurity in 2017, the Australian Government has been working with Animal Health Australia, state and territory agencies and aquatic industries to develop an aquatic emergency animal disease response agreement (Aquatic Deed) that would outline payment obligations in the event of a future aquatic disease outbreak in Australia. This Aquatic Deed has yet to be agreed on by all parties.