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No: **…..** /TY-TS	*Hanoi, date………*

Re: comments on the draft "Report on
bio-security risk assessment in
importing prawn for food use
from countries into Australia

To: Australian Embassy in Hanoi

On the basis of the content discussed and agreed at the 2nd Vietnam-Australia Meat and Seafood Market Access Working Group meeting (virtually held on November 4, 2020 at the office of the Australian Embassy in Hanoi), - Agriculture Counselor The Australian Embassy in Hanoi sent a letter and informed that the Australian Department of Agriculture, Water and Environment (DAWE) had posted on DAWE's website for comments on the draft. "Biosecurity Risk Review Report of Prawns Imported from all Countries for Human Consumption" (hereinafter referred to as the Review Report). After studying this Review Report, the Vietnamese side has the following opinions/comments.

I. RECOMMENDED GENERAL BIO-SECURITY MEASURES FOR IMPORTED PRAWN

1. In the draft report, in section 5.1.5, it is mentioned that marinated, breaded, battered and crumbed (BBC) prawn, dumpling and dim sum-type products are now classified as value-added products and deeper processing methods are applied than before (in the 2009 risk assessment report). The Vietnamese side believes that the above-mentioned value-added products (marinated, breaded, battered and crumbed (BBC) prawn, dumpling and dim sum-type products) are processed as before, significantly reducing the risk of spreading pathogens, especially when they are used for the right purpose (for human consumption). Therefore, to apply new and stricter control measures, it is recommended that the Australian side provide additional actual assessment data (monitoring data, pathogen testing) for the consignments imported to Australia from Vietnam to have scientific grounds to confirm that processed products as before are likely to cause disease outbreaks in Australia. At the same time, it is suggested that the Australian side have measures to manage and strictly control the compliance with the intended use of this value-added products.

2. In the draft Report, section 16.2.6 only regulates controls for wild-caught Australian prawn products exported to a third country for processing, to re-export to Australia, and no regulation on controls for Australian farmed prawn. Therefore, it is recommended that the Australian side consider and propose appropriate control regulations for farmed prawn.

3. The disease situation in prawn and the methods for controlling and monitoring prawn disease in different countries are different. On that basis, it is recommended that the Australian side review and consider making the appropriate risk management measures for each country and territory.

II. REVIEW ON THE RISK AND RELEVANT BIO-SECURITY MEASURES FOR EACH DISEASE

1. For the diseases caused by the Covert mortality nodavirus (CMNV), the Decapod iridescent virus 1 (DIV1) and the Laem-Singh virus

The impact level of these diseases is only limited in some countries, so Vietnam asked the Australian side to consider not requiring all countries to certify freedom from these diseases upon prawns exported to Australia.

Pursuant to the provisions of Section 2.4.1, the Aquatic Animal Health Code of the World Organization for Animal Health (OIE), it is recommended that Australia consider some of the following contents:

a) About the pathogens

- All the three pathogens are not under the list of OIE Diseases. In fact, over the years since its discovery, CMNV and DIV1 also appeared only in 2 or 3 countries, not yet spreading to many other countries; the Laem-Singh virus has not been confirmed as a major causative agent in prawn loss. Specific information is as follows:

+ For CMNV: The virus was discovered in 2002 but mainly in scientific research and was officially confirmed to appear in China and Thailand. In a report by Zhang et al. published in 2017, CMNV was detected in Vietnamese prawn samples, but this study has not been verified and compared. Vietnam has not yet recorded this disease presence, so it is impossible to conclude that the virus has appeared in Vietnam

+ For Laem-Singh virus: The virus was detected in 2008 and mainly occurred in Thailand; Some studies have found this virus in healthy prawn in some countries, but not causing damage to prawn, and also not confirmed that this virus is the main cause of slow growth syndrome in prawn.

+ For DIV1: The virus only appeared in China since 2014 and mainly on farmed prawn; Other countries all confirmed that there is no DIV1 virus; In 2020, there was research to announce virus detected in wild tiger prawn in the Indian Ocean.

- The Vietnamese disease surveillance system has also not detected these pathogens in Vietnam.

b) Country factors

- The presence or the level of prevalence in importing countries:

+ Risk from inported prawn: Since the occurence of these pathogens, the Australian side has not asked Australia's recognized disease-free countries to control these diseases in order to export prawn and prawn products to Australia; therefore, it is not possible to determine whether these pathogens have appeared

in Australia or not. We would require the Australian side to provide more information and monitoring data for these viruses on prawn imported from these countries to Australia.

+ Risk from the virus already been in country: In the draft report, the Australian side just described the risk of the virus occurring in Australian wild caught seafood, hatcheries and farms; but has not provided specific data on active surveillance, prawn sample test results in the country to determine whether the agent has appeared in Australia or not. In particular, the Australian side has not specified CMNV and DIV1 diseases in the Australian List of Reportable Diseases. Therefore, it is recommended that the Australian side carry out an epidemiological investigation of these diseases in Australia then shares the results of the investigation with Vietnam.

- Separate assessment of the control systems for these diseases in the prawn exporting countries to Australia: Australia has only assessed and recognized the disease control system for a number of diseases that Australia previously required (including TSV, YHV1, WSSV); Therefore, it is recommended that the Australian side continue to review and evaluate the control system for these new diseases in the countries that Australia has recognized disease freedom to export prawn to Australia.

2. With Enterocytozoon hepatopenaei (EHP)

According to NACA, EHP spores will be inactivated at -20°C for 2 hours, so it is recommended that the Australian side remove the requirement to control EHP spores for frozen prawn and prawn products.

3. With infectious myonecrosis virus (IMNV), Taura syndrome (TSV) and yellow head virus (YHV1)

These viruses are on the List of Reportable Diseases of Vietnam. Since 2010 till now, the Vietnamese side has conducted surveillance, sampling and testing of these pathogens. Results so far is that Vietnam has not detected any appearance of these pathogens. In addition, prawn importing countries have not detected these agents in Vietnam's prawn consignments yet. Therefore, it is recommended that the Australian side consider and recognize the capacity of Vietnam's disease control system for these diseases. At the same time, Vietnam requestes the Australian side to temporarily not require 100% inspection of the YHV1 consignment but apply random inspection of prawn consignments from Vietnam to Australia.

4. In case the Australian side requires countries to certify disease freedom from new diseases, it is recommended that the Australian side consider the time of application of this requirement no earlier than 2 years after issuance of this regulation so that export activities by trading partners would not be affected.

DAH would like to request the Australian Embassy in Hanoi to support the delivery of this document to the Australian Department of Agriculture, Water and Environment for consideration./.

To:
- As mentioned;
- DG (for reporting);
- DDG;
- NAFIQAD;
- Filing.

For the DG
DDG