April 2024

Import risk review for dairy products for human consumption

Response to submissions received from the first draft report.

The department received a number of submissions on the *Import risk review for dairy products for human consumption*: draft report. A combined response document has been prepared as there was significant similarity between many of the questions and comments received.

Is there assurance that existing trade will remain?

It is not expected that current trade will be impacted. There is new risk management proposed for the risk of peste des petits ruminants (PPR) in dairy products from ovine and caprine species. Currently, countries that have PPR also have foot-and-mouth disease (FMD), and so the risk management measures for FMD also manage the risk for PPR. The PPR-Free Country List will ensure that any changes to the spread of PPR will be adequately managed in the future.

There is insufficient detail to explain how the minimum requirements will operate.

The minimum requirements are to manage the risk of diseases other than FMD, lumpy skin disease (LSD), sheep pox and goat pox (SGP), PPR and scrapie, which were found to be a biosecurity risk in dairy products in the draft report. The minimum requirements acknowledge that some food safety requirements such as pasteurisation and sourcing from healthy animals also manage the animal biosecurity risks of a range of diseases (described in Appendix A of the review). They will be included as statements on the health certificate, of which the competent authority will attest to.

Clarity on the new alternative heat management options.

The new alternative heat treatments are treatments that have been assessed as being able to manage the risk of FMD in dairy products. Having treatments other than retorting (current option) as a risk management option for dairy products from countries not on the department FMD-Free Country List enables products to be assessed for equivalence against these already approved heat treatments. The new alternative heat treatments are designed to provide a way for importers to import some dairy products from countries not on the department FMD-Free Country List. However, it is not designed to enable the import of all dairy products from these countries as this would not manage the FMD risk. It is understood that some products will not be able to be meet the new requirements, and these products can be considered on a case-by-case basis.

Greater clarity is needed on why Australian conditions are more conservative than WOAH.

The department FMD-Free Country List differs from the WOAH list as Australia conducts a separate country FMD assessment. The department independently evaluates any requests to recognise country or zone freedom for FMD, consistent with our international obligations. These evaluations require a significant investment of resources from both bilateral partners and include a desk audit and in-country audit.

The department has proposed more conservative import conditions than what is recommended by WOAH for dairy products from countries not on the department FMD-Free Country List because of two main reasons:

1. The department is aware that feeding dairy products imported for human consumption to livestock is a common occurrence.
2. There is scientific evidence that demonstrates that the WOAH recommendations are not enough to adequately manage the risk of FMD in dairy products. This evidence is summarised within the FMD risk review chapter of the draft report.

Virus levels in milk in a natural outbreak would not be as high as those used in experimental conditions.

Some studies consider that the infective dose (ID_{50}) for pigs and cattle is higher than what could be transmitted in commercial pasteurised milk during an outbreak, and that there is little risk of disease spread through contaminated dairy products. However, the ID_{50} indicates the viral titre that will cause 50% of a population to become infected when exposed to the disease and decreases as the number of exposed animals increases. This means that the minimum infective dose for only one animal does not directly correspond to the risk of infection of one in multiple animals.

There is limited published information available about foot-and-mouth disease virus (FMDV) in milk from FMD-endemic countries. Many studies assume that an FMD outbreak will be isolated, leading to a high level of viral dilution in bulk milk. However, management practices in FMD-endemic countries are likely to be different with regard to isolation of infected animals, and the number of FMDV-infected animals contributing to the milk supply at any given time may be higher than in countries where FMD is not endemic. Thus, the assumed dilution factor of FMDV in bulk milk may not be as great in FMD-endemic countries.

Additionally, Australia's appropriate level of protection (ALOP) is to manage the risk of entry, establishment and/or spread of a hazard to a very low level of risk and is not about the likelihood of an infectious dose. Furthermore, the proposed conditions are for milk and dairy products, including cream. They reflect that some dairy products have a higher fat content and need a stronger inactivation method.

Inoculation into cattle is a very sensitive, but artificial means of detecting foot-and-mouth disease virus.

The interpretation of FMDV-infectivity and inactivation studies can be difficult due to the different routes of inoculation, the different sample types used for testing, and the different detection methods employed. Inactivation studies are often undertaken following intravenous, intramammary, or intranasal inoculation or contact exposure to FMDV. Although intranasal and contact exposure may be considered more representative of natural infection under field conditions, the mammary gland is an important

replication site for FMDV, and FMDV titres in milk from intramammarily inoculated cattle have been demonstrated to be similar to those from experimental contact exposure.

During the viremic stage, virus concentration may be below the detection limits of cell culture, and so animal bioassays using steer inoculation are used for FMDV detection. Although inoculation is not representative of natural infection in the field, it is a sensitive method for detection of infectious FMDV in milk samples when determining if FMDV has been fully inactivated.

The department should consider more recent research than that referenced in the review.

The department references original studies where possible. Older research is often used and referenced in new research papers, and these have been referenced in the review along with more recent research. The second draft report of the review has additional, more recent references included, particularly in the FMDV risk review.

It is important that the additional foot-and-mouth disease risk management measures are not perceived as a relaxation of Australia's attitude to biosecurity.

The department will ensure that any messaging about the new FMD risk management measures is about how the biosecurity risks are adequately managed, supported with scientific evidence.

There is limited evidence in the scientific literature that supports lumpy skin disease virus being transmitted to cattle through commercially (heat treated) milk.

The department considers that at the time the first draft report was published, there was not enough evidence to support the position that lumpy skin disease virus (LSDV) is non-viable in milk following all methods of pasteurisation. Since the first draft report was published, new research results have become available demonstrating that LSDV is inactivated in milk following high-temperature short-time (HTST) pasteurisation. This research, in combination with other available evidence, provides confidence that batch, HTST, and UHT pasteurisation are able to effectively inactivate and manage the risk of LSDV in milk.

The results of the research looking at HTST pasteurisation to inactivate lumpy skin disease virus should be considered in accordance with the science led approach adopted for the entire review.

Any changes to import conditions will be made based on strong scientific evidence to ensure all biosecurity risks are adequately managed. They will be implemented following the publication of the final report.

More information

More information, including answers to frequently asked questions can be found on the department's website.

Web agriculture.gov.au/biosecurity-trade/policy/risk-analysis/animal/dairy-products-for-human-consumption

Email animalbiosecurity@aff.gov.au

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.