

21st November 2022
Australian Government
Department of Agriculture, Fisheries & Forestry

RE: Review of rabies virus risk in imported dogs, cats, and canine semen from approved countries Draft report

Animal Care Australia (ACA) is a national incorporated association established to advocate for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

ACA has concerns with the recommendations outlined within this Draft, namely:

1. **ACA does not support the methodology being cited due to the direct and unnecessary impact on animal welfare.**
2. **ACA questions why the risk assessment draws its conclusions based on trends of overseas fraud without any supporting or documented data showing animals affected by rabies have entered this country**
3. **ACA does not support the proposed increase from 10 to 30 days for quarantining of dogs and cats.**

ACA is of the strong position should the recommendations within this Review be implemented this will lead to extreme overcrowding placing the welfare of animals in quarantine at risk. ACA cannot and does not support the recommendations and we call upon the government and Department of Agriculture, Fisheries & Forestry to reconsider.

Therefore, ACA would like to add the following recommendations:

- ✓ **To ensure the authenticity of testing of DNA samples, they must be analysed at the time of collection (which could be done via the blood collection) and then repeated on arrival in Australia. This would ensure the credibility of the samples and the laboratory completing those samples.**
- ✓ **Animal welfare should not be compromised to reduce workload or responsibility of department staff.**

To be clear: ACA DOES NOT support the recommendations.

Should the department wish to consult further on this submission, ACA welcomes the opportunity to meet with you to discuss our concerns and recommendations in more detail.

Kind regards,



Michael Donnelly
President, Animal Care Australia.
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Animal Care Australia

2022

**Draft report - Review
of rabies virus risk in
imported dogs, cats
and canine semen
from approved
countries**

Approved: 17th November 2022
Animal Care Australia Inc.



Draft Report - Review of rabies virus risk in imported dogs, cats and canine semen from approved countries

Animal Care Australia submission.

ACA Background:

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals.

Opening statement:

ACA notes the basis of the draft changes are in response to non-compliance and on fraudulent practices and occurrences overseas.

ACA believes the justification and the scientific data do not align with and do not support the recommendations presented in the Draft Review document.

It is the responsibility of bio-security officials to ensure that all documentation is legitimate.

ACA's position is that the issues outlined as justification for changes could be readily remedied by implementing a system where only accepting results from reputable labs (such the current use of AQIS vets who are held to a higher level of liability) would be a better way to ensure biosecurity and the protection of our borders.

ACA questions how or why the importation documentation for animals is deemed different to that of humans traveling across borders?

The solution to the issues outlined must not include the holding (quarantining) of animals for long periods of time in less-than-ideal conditions and with no socialisation or visitation for owners.

Sadly, this has not been the case since our three quarantine stations were amalgamated into one. While ten (10) days is hard enough for dogs and cats, thirty (30) days IS NOT necessary in this day of greater technology and processes.

Animal welfare does indeed include the importance of biosecurity at our borders – BUT – it also includes the treatment animals must endure once they have crossed a border and into this country.

Priority MUST BE given to animal welfare over the need to simplify the responsibilities of biosecurity officers.

References:

The Draft Review can be found here: [The Draft](#)

ACA's Response to the Draft Review:

2.11.2 Changing profile of exporting countries

New Zealand is consistently the top exporting country for dogs and cats being imported into Australia. This has not changed since the 2013 review. However, dogs and cats being imported from New Zealand do not require an import permit and do not undergo PEQ on arrival.

The profile of other exporting countries has changed since the time of the 2013 review. At the time of the 2013 review, 60% of the import permits granted were for dogs and cats for export from the United States and the United Kingdom, with another 15% from Canada, South Africa and Singapore (Department of Agriculture 2013). In comparison, import permits for the United States and the United Kingdom, made up only 40% of those issued in 2021. Permits from Canada, South Africa and Singapore made up 21% for the same period.

In 2021, the top ten exporting countries were (in descending order based on import permits issued) the United States, the United Kingdom, Hong Kong, Singapore, South Africa, Canada, United Arab Emirates, South Korea, Japan and Germany. These countries accounted for 81% of import permits issued during this period.

ACA draws attention to the fact these statistics are not reflective of normal importation numbers due to the Covid-19 pandemic that resulted in major impact on the cessation of importing and animal transport, in fact, most transport where the majority of the world were under lockdowns and travelling bans.

Therefore logically, imports permits from the United States, United Kingdom, Canada, South Africa and Singapore would all be significantly different (lower). ACA notes Singapore was one of the first countries to open up covid free and from that time Australia started accepting flights from them.

2.11.3 Increasing commercialisation

Internationally, there has been significant growth within the companion animal breeding industry with large scale commercial breeding organisations, increasing international trade and use of the internet to facilitate sales (Maher & Wyatt 2021). In Europe, there is growing evidence that criminal networks are becoming involved in lucrative puppy imports (Maher & Wyatt 2019, 2021; Zucca et al. 2020). This illegal puppy trade, and online puppy sales scams, were reported to have increased during the pandemic (Better Business Bureau 2020; British Broadcasting Corporation 2020). Norman, Stavisky and Westgarth (2020) conducted a survey

of pet importers and found that people importing rescue dogs into the United Kingdom used social media to find suitable dogs and rescue groups to handle the importation. Most respondents seemed unaware of the import conditions, as 89% reported their dog had been imported under the European Union Pets Travel Scheme, which they were not eligible for (Norman, Stavisky & Westgarth 2020).

The above statement implies this Review is basing its decisions on trends of overseas fraud without any supporting or documented data showing animals affected by rabies have entered this country. ACA notes the majority of the cases occurred where animals crossed borders that did not have a quarantine requirement.

How is this a logical conclusion to make, especially when it results in animals being unduly quarantined, placing them in a ‘limbo’ and increasing their stress levels due to unnecessary confinement – compromising their welfare.

ACA does not support the methodology being cited due to the direct and unnecessary impact on animal welfare.

3 Risk assessment

This section reviews the risk of RABV introduction associated with importing dogs and cats under Australia’s current import conditions and considers whether those risks have changed significantly since the introduction of the existing conditions in 2013. However, due to the detected operations of fraud networks, export only from an approved country may no longer provide the level of risk management intended in the 2013 review. Accordingly, this risk assessment has considered the likelihood of entry in a dog or cat being imported into Australia from any country.

Again, ACA questions why the risk assessment draws its conclusions based on trends of overseas fraud without any supporting or documented data showing animals affected by rabies have entered this country.

In recent years, there have been changes to the international trade environment for companion animals.

There has been a marked increase in the yearly number of dog and cat imports into Australia since the 2013 review.

Internationally, there has been significant growth within the companion animals breeding industry, with large-scale commercial breeding organisations, increasing international trade and online sales (Maher & Wyatt 2021).

Concurrently with these changes to the international trade environment, there appears to have been an increase in the level of non-compliance around rabies vaccination and RNATT results. This may, in part, be the cause of an apparent spate of RABV-infected dogs being moved internationally in recent years.

Where is the supporting data indicating ANY dogs and cats have been moved into Australia as part of this increased international trade?

4.1.1 Pre-export risk management considerations

Identification

To ensure the microchip relates to the animal being exported, before pre-export preparation commences (and before blood is collected for an RNATT), a declaration by an official veterinarian, should accompany the import permit application. This should certify that the official has scanned the animal's microchip, that the animal is microchipped with the stated microchip number and the location of the microchip.

The risk management measures proposed in the 2013 review can no longer be considered effective due to the level of detected and suspected non-compliance and fraudulent documentation relating to the animal's identification. This proposed identification check by an official veterinarian will provide additional assurance that the individual cat or dog for import into Australia has been correctly linked to accurate pre-export preparation.

While ACA finds this proposal has been developed based on overseas cases and NOT dogs and cats imported into Australia, we do not have an objection to this being implemented.

4.2.1 post-entry quarantine (PEQ)

Since the 2013 review when the PEQ period was reduced to at least 10 days, there have been no cases of rabies in PEQ or following released from PEQ. However, there have been imports of companion animals incubating RAB in other countries (Table 1). From 2002 to 2013, there were 21 rabies cases in animals in western Europe after importation from Morocco and eastern Europe (Perez de Diego et al. 2015; Ribadeau-Dumas et al. 2016). Nine rabid dogs were imported into France between 2001 and 2011 (Mailles et al. 2011), four into the United States between 2015 and 2021 (OIE 2021b; Pieracci et al. 2021; ProMED 2020, 2021; Raybern et al. 2020) and two into Canada in 2021-2022 (OIE 2021d, 2022). No PEQ period is applied to imports in these countries and these cases were associated with illegal movements, smuggling or commercial imports.

Table 12: Imports of companion animals incubating RABV since 2011

Year	Country	Details	Time to clinical signs / death after import	Reference
2011	France	Illegal importation of dog from Morocco via Spain to France	1 day	Mailles et al. (2011)
2013	Spain	Illegal movement of dog from Morocco	50 days	Perez de Diego et al. (2015)
2016	Western Europe	Study of imported cases in western Europe between 2001 and 2013. The majority of these were non-compliant with import conditions.	14 days (average infectious period).	Ribadeau-Dumas et al. (2016)
2019	The United States	Import of dogs from Egypt via Canada	23 days	Raybern et al. (2020)
2021	Germany	Illegal import of 8-week-old puppy from Turkey via Bulgaria to Germany	7 days	OIE (2021c)
2021	Canada	Import from Iran	10 days	OIE (2021d)
2021	The United States	Rescue import from Azerbaijan	3 days	OIE (2021b)
2022	Canada	Import from Iran	197 days	OIE (2022)

ACA notes all Countries listed in Table 12 and utilised by this Review to justify the increasing of quarantine holding times in Australia to 30 days DO NOT have post testing times of 180 days prior to import and we question utilising these countries. If there is such a concern in relation to this list, then ACA recommends the Countries listed in Table 12 are included in the list of Countries that REQUIRE the dog and cat to have been tested for at least 180 days prior to import rather than adding the extremely unnecessary burden of a 30 days quarantine in Australia.

For dog and cat imports from group 1 and 2 approved countries, the biosecurity risk of RABV is managed entirely offshore and no change is recommended to the PEQ period of at least 10 days.

Dog and cat imports from group 3 approved countries should undertake a PEQ period of at least 30 days if they have been prepared in compliance with the pre-export measures. In some cases, animals may need to be held longer than 30 days to verify compliance with the pre-export measures, in which case, the period should not exceed 180 days. This increase in PEQ period is required due to the significant risks due to commercialisation of the companion

animals trade, and the increase in detected and suspected fraudulent certification for pre-export measures.

Based on the cited article below, ACA questions how a 30-day holding period will make a difference if the usual incubation period is 10 days to 6 months?

ACA also queries what the deciding factors in keeping an animal from a category 3 country for longer than 30days were, and why they are not included in this Review?

- *The incubation period for rabies can range from 10 days to 6 months, with most cases apparent after 2 to 24 weeks (Greene 2013; Hampson et al. 2009; Sparkes et al. 2015).*

Post-entry verification

Due to the increases in detected and suspected non-compliance and fraudulent certification, additional verification may be required for imports from approved countries to ensure the RABV biosecurity risks were managed in line with Australia's import conditions. In instances where it is required, this verification at a minimum should ensure that the animal's veterinary health certificate and associated documentation is true and correct, and compliant with the import conditions. Imported dogs and cats must be held in PEQ pending this verification for no longer than 180 days.

Verification could include the following:

- *Confirming authenticity of paperwork and microchip details with the competent authority of the exporting country.*

Isn't this already the responsibility of the Departments and staff as it is with human travellers?

- *Confirming the validity and accuracy of test results and associated information with the testing laboratory.*
- *Confirming the vaccine lot numbers and expiry dates used in that geographical area.*

ACA recognises the existing expenses related to the lodgement of paperwork and to have animals in quarantine. Given the above recommendation are already included in the current fees, these processes should be met by and the responsibility of the government (department).

- *Veterinary examination findings, testing or imaging; for example, confirming age by dentition.*

ACA supports this recommendation caveated by the inclusion of using regulated vets and labs to ensure authenticity

ACA does not support the proposed increase from 10 to 30 days for quarantining of dogs and cats.