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Sydney NSW 2000

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Sydney NSW 2001

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The Agriculture and Environment Committee Hendra Vaccine Inquiry  
C/- Mr Rob Hansen  
Parliament House  
Brisbane  
Qld 4000.  
[robert.hansen@parliament.qld.gov.au](mailto:robert.hansen@parliament.qld.gov.au)

*By email*

Dear Mr Hansen

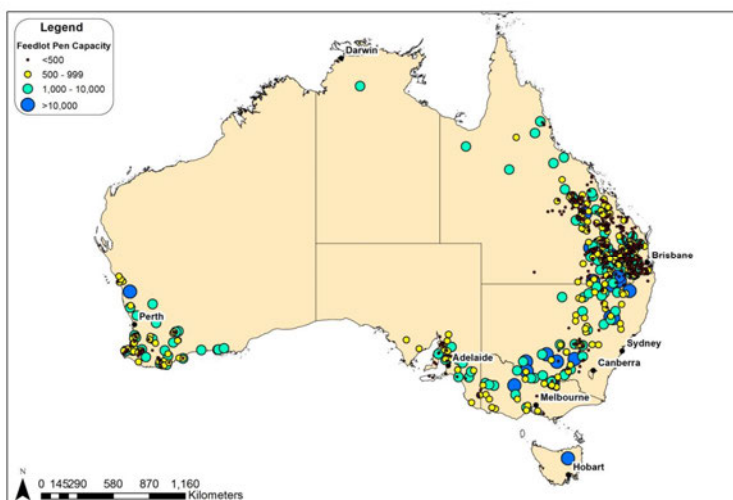
**RE: ALFA SUBMISSION QUEENSLAND PARLIAMENT HENDRA INQUIRY**

Australian Lot Feeders' Association (ALFA), the peak representative body for the cattle feedlot industry, welcomes the opportunity to provide comment to the Queensland Parliament Hendra Vaccine Inquiry. ALFA's responses to the Terms of References for this inquiry follow.

**INTRODUCTION**

The cattle feedlot industry has a value of production of approximately \$2.6 billion and employs some 28,600 people directly and indirectly. There are approximately 400 accredited feedlots in Australia and 55% of these are located in Queensland, with the majority located in areas such as south east QLD; the northern Tablelands and the Riverina area of NSW (see Graph 1).

**Graph 1. The location, number and size of feedlots throughout Australia**



Whilst the majority of feedlots are not located within the higher risk zone for Hendra Virus (HeV), the widespread habitat of flying foxes, extensive movement of horses and the long incubation period of the virus, means that feedlots and other agricultural businesses throughout the state (and Australia) are at risk from the disease. As a zoonotic disease, HeV presents a particular risk to feedlot staff who are in close contact with their animals. Feedlots typically rely on horses for stock work in feedlots involved in the continual monitoring of cattle health and welfare. Horses play a key role in the management of feedlots to achieve welfare outcomes that meet community expectations. Conservatively more than 2000 horses reside on cattle feedlots, not including spelled or introduced horses. ALFA considers the biosecurity risk beyond the feedlot gate as many of these horses are bred, trained and educated off-site and many travel frequently to partake in competitions and events.

ALFA encourages all feedlots to undertake their own risk assessment for HeV in conjunction with their consulting veterinarian. It is a legal obligation under workplace health and safety laws that precautions must be taken by feedlot operators to minimise the risk of zoonotic disease infection. To ensure that they comply with relevant legislation feedlots in the endemic HeV area are strongly encouraged to manage the biosecurity risk of HeV through a preventative approach including vaccination of all feedlot horses combined with best practice biosecurity measures that are included in the National Feedlot Accreditation Scheme (NFAS). Feedlots not located in an endemic area are also asked to consider their HeV vaccination policy decisions based on the level of risk to the individual feedlot.

## **TERMS OF REFERENCE**

### **The development, trials and approval processes**

ALFA is aware that the Hendra vaccine has gone through a thorough development, trial and approval process, as is evidenced through its successful full registration with the Australian Pesticides and Veterinary Medicines Authority (APVMA). The APVMA's standards are stringent by global standards. Because of this ALFA is confident that the Hendra vaccine is a safe and highly effective means of preventing Hendra virus infection in horses, and subsequent transfer to humans.

ALFA also recognises the protracted process APVMA has undergone to establish duration of immunity of the Hendra vaccine after determining safety. One issue with the Hendra vaccine has been the requirement to administer the vaccine as a booster every six months, which is at odds with the utilisation of other common vaccines in the equine market, as APVMA considers data submissions from the manufacturer to grant 12 month duration of immunity. Whilst ALFA does not support compromising standards of registration, especially for determination of safety, a review of the process for determining duration of immunity would appear justified.

### **The incidence and impact of adverse reactions by horses following vaccination and the reporting of adverse reactions and economic impacts of the Hendra vaccine**

It is ALFA's understanding that from the 300,000 doses of the vaccine that have been administered there has only been a 0.28% reaction rate. This is consistent with ALFA member's experience in utilising the vaccine and is insignificant compared to the reported reactions from common human vaccines such as tetanus and the flu injection at 80%.

### **Who bears the risks of HeV infection and who incurs the costs and receives the benefits from each risk mitigation option?**

All people and susceptible animals that come into contact with a HeV infected horse potentially bear the risk of HeV infection. Since HeV emerged in Australia in 1994, almost 100 horses have died or been euthanased across approximately 55 separate outbreaks. In addition, 7 people have become infected, of which 4 have lost their lives. All of the equine infections since the release of the vaccine in late 2012 have occurred in unvaccinated horses.

Horse owners have a responsibility to mitigate the risk of HeV infection for all people that come into contact with their horses. This is so that they, and others coming into contact with their horses, are not put at risk of contracting the disease. Legally this responsibility is also shared by business owners including veterinarians and feedlot operators, as it is a legal obligation under workplace health and safety laws that precautions must be taken to minimise the risk of zoonotic disease infection.

On many feedlots a risk assessment of HeV suggests that, whilst the likelihood is low the consequences are high. As a result, because feedlots require horses on site, where the vaccine is being used its cost is largely covered by the employer in order for them to comply with workplace health and safety legislation. The large corporate feedlots tend to have a vaccination policy – with their respective sites picking up the cost of vaccination. Other feedlots cover the cost of vaccination of a fixed number of horses with the balance being at the employee's/horse owners cost. Given the frequency of horse movements in and out of the feedlot sites Hendra vaccination and verifying of compliance is expensive, time consuming and a challenge to manage effectively.

Along with the workplace health and safety implications of failing to vaccinate all horses, feedlots are also concerned with the impact of a HeV case on business continuity. It is ALFA's understanding that in the case of HeV on a property, unvaccinated horses may be quarantined for up to 30 days to enable them to be tested and may also not be able to be used/ridden for up to 30 days, which will impact on business as usual in the feedlot. ALFA is also concerned with the potential impact of a zoonotic disease case, such as HeV, on a feedlot on the market, particularly from international customer perceptions for the safety of beef.

#### **Whether the guidelines/procedures required for veterinarians attending horses that are not vaccinated against HeV are proportionate to the consequences**

The risk to both veterinarians and horses that are subsequently treated of contracting the HeV is high in the high risk HeV areas, and ALFA is supportive of those veterinarians that have implemented policies to only treat horses that have been vaccinated against HeV. A key consideration is that an infected horse can shed HeV before it shows any signs of illness. This means that there is a risk of apparently healthy horses infecting other horses or people with HeV virus up to 3-5 days before the onset of illness.

#### **Impacts on the equine industry and the economy arising from veterinarians applying a policy not to treat unvaccinated horses**

ALFA believes that in the high risk areas, vaccination is the most effective way to reduce the risk of HeV infection to both horses and humans. Other procedures such as good hygiene and biosecurity measures may help to minimise the risk of the disease but will not prevent infection in endemic areas if there is still likely to be interactions between horses and flying fox excretions. Therefore the impacts on the equine industry and the economy arising from veterinarians applying a policy not to treat unvaccinated horses are low compared to the impact of humans and horses dying from a disease that they have contracted from an unvaccinated horse.

ALFA acknowledges that this policy could result in the suffering of unvaccinated sick horses that may receive sub-optimal treatment until results of HeV exclusion testing are received. However, any suffering can be avoided by prior vaccination of these animals against HeV.

#### **The impact of Workplace Health and Safety actions on the decision by veterinarians not to attend unvaccinated horses and results of previous Workplace Health and Safety HeV investigations where there have been Human infections.**

ALFA recognises the difficult position equine veterinarians have been placed in, especially in Queensland, with regard to interpretation of current Workplace Health and Safety (WH&S) regulations and managing suspect HeV equine cases.

The situation whereby the equine veterinarian's workplace is considered the property housing the suspect horse, and neighbouring properties, during the elapsed period from first consultation until the result of exclusion testing is unique and problematic.

Under current interpretation, the attending veterinarian is expected to exert controls on people movements within the target property and on its boundaries, and administer a quarantine on the horse until the exclusion test is returned, which when straddling a weekend can take upwards of 3 – 4 days. Additionally, the veterinarian is responsible for conducting biosecurity education of the owners, neighbours and any other individuals who come into contact with the target property, as well as providing appropriate personal protective equipment to all these individuals. This is often beyond the scope of the typical private veterinary practitioner and recent WH&S prosecutions have been punitive in these areas. In many cases, horse owners are extremely emotive with regard to their horse's welfare yet at the same time unwilling to meet the costs the veterinarian has endured administering a quarantine which complicates further the situation for the veterinarian. With the prospect of WH&S prosecution additionally in the background, it is understandable some veterinarians have been reticent to attend potentially positive HeV cases. Unvaccinated horses are more susceptible to HeV and therefore more likely to be a positive HeV case when illness is present.

In response, ALFA seeks clarification for both veterinarians, horse and business owners on the interpretation of current WH&S regulations with regard to potentially positive HeV cases and recommends further support (including instructional material, hotline, financial etc) be given to veterinary practices in recognised high risk Hendra areas.

If you require any further clarification on any of the above matters please do not hesitate to contact me.

Yours sincerely



Bridget Peachey  
Manager, Policy and Projects

