

## HORSE INDUSTRY SUBMISSION BIOSECURITY BILL 2011

**Prepared by,** Dale Anderson, Queensland Racehorse Owners Association representing Thoroughbred Racing and Breeding and Trainers  
Kent Wells Chairperson of Queensland Horse Industry Alliance inc

This submission has been prepared by Dale Anderson a board member of the Queensland Racehorse Owners Association, a Thoroughbred Breeder, Racehorse owner, stud farm owner, and a member of DEEDI's Horse Industry Biosecurity and Market Access Liaison Group (HBMALG). In regard to this submission we have consulted widely with respect to the cattle tick aspects of this submission and have letters of support from many of the industry groups.

The 13 industry groups have 50,000 members and consultation is important to them. The group's representatives vary from professional multi-million dollar businesses to hobbyists and there can be very different points of view, we have been able to achieve general consensus for the submission as minuted in a meeting of the Queensland Horse Industry Alliance Inc (15/12/11). Members of HBMALG have met with biosecurity officers working on the draft legislation and we note that some very important issues raised with them have been omitted or ignored. **We believe by omitting these aspects some of the function of the new bill for the horse industry will be onerous, inflexible and frankly a debacle** as some aspects are now and we note the ombudsman's report in this regard.

The industry groups contributing through their executives include the following and make up the vast majority of the Queensland horse industry, they are Queensland Racehorse Owners Association , Queensland Polocrosse, Equestrian Queensland, Arabian Society, and Queensland Pony Club, Riding for Disabled, Australian Stock Horse, Australian Campdraft Association, Professional Rodeo Association, Queensland Endurance and Light Horse. Thoroughbred Breeders and Race horse Trainers association also provided letters of support.

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### **Introduction**

As this submission represents the vast majority of the horse industry we will refer to the Queensland Horse Industry as "industry".

Specific reference has been made to cattle tick horse movements as this aspect of the current legislation is grossly unfair and untenable in the future. In addition the horse industry have particular interest in biosecurity, given our experiences with equine influenza which has highlighted areas that improvements can be made. Hendra and the Ombudsman's report on the management of Hendra have also influenced the submission. And we refer to the Beale Report which in our opinion is a good guiding document. We note that there are specific areas that Beale identified as failures in Biosecurity and these have not been addressed in the new bill.

Traditionally the horse industry has been a low priority for its economic value or importance as reflected in resources allocated by the DEEDI. Unlike dairy, beef sheep cane horticulture and many other agricultural industries the horse industry does not have any DEEDI development officers, there is no research capacity, there are no development contacts for industry (other than a horse biosecurity liaison person) and there are no DEEDI links for the industry with universities in Queensland. Recently the Horse Industry has shown it has significant economic and biosecurity related matters (e.g. impact of EI, community response to Hendra), hence it deserves more appropriate recognition.

Our members encompass a broad spectrum of individuals and businesses. For the purposes of this submission the industry wishes to be considered as one. It is estimated the membership of our groups is 45000 to 50,000 individuals. Individual's varies from professional multi-million dollar business to hobbyists.

Legislation needs to be very carefully considered and tailored to suit the extent of membership and its scope and as such we seek ongoing consultation with the development of the regulations as history has shown that regulation for the horse industry has delivered a very unfair result (e.g. cattle tick zones).

The horse industry is significant and contributes greatly to the State economy, recent work indicates that the horse industries GDP contribution to the Queensland economy is 1.3 billion dollars annually and it also has a considerable role in the, sporting, social and cultural ethos (examples include the Magic Millions Racing carnival or the Warwick Campdraft Gold Cup. The Biosecurity Queensland Legislation Project Team meets regularly with key stakeholder bodies, and we note that the horse industry has never been given key stakeholder status or engaged at this level.

The horse industry submits that the following aspects of the bill could be enhanced in regard to our interests:

As requested by Mr Rob Hansen the submission has each issue listed with the relevant section in the bill in a table form, but as there has been **complete omissions** of issues raised at previous meetings with biosecurity we have just suggested that these be included and possibly where they are included. We apologise that the order of the table does not follow the bill order.

ISSUE	SECTION
<p><b>Movement record requirement</b>                      The bill reads</p> <p>(4) Subsection (5) applies to the conveyor or drover of an animal for a movement if, under this section—</p> <p>(a) a movement record is required for the movement; and</p> <p>(b) the relevant person is required to ensure that the conveyor or drover has, in the conveyor’s or drover’s possession, before the movement starts, <u>a copy of the</u> Movement record.</p> <p>We believe the wording SHOULD NOT have the words a copy, we are in the age of a paperless society many of us operate without the need for paper copies and for businesses that do many movements the accumulation of paper copies can become superfluous rubbish that is never referred to for future biosecurity. We DID clearly state this to biosecurity officers and general agreement was reached that alternative forms of permanent records are a better way to go, these records could be, web based, or logged into data bases that can be accessed by biosecurity officers if need in the future. And innovation such as GPS and palm pilots can be used or texted messages and information held on a mobile phone or palm computer/ipad. This would take some innovation and investment in web based data bases</p>	<p><b>Division 4</b>  <b>Movement records</b>  <b>180 Movement record requirement</b></p> <p><b>Also relates to</b>                      106 Requirement to answer question or give information</p>

but as compared to the printing and distributing paper booklets and printing and distributing of faxed permits the benefits far greater to go to a paperless route (come on we are meant to be the smart state?).

The wording **keep a copy** is located elsewhere in the bill and these may need to be revisited also.

A suggested wording could be  
“an appropriate copy in a form suitable for the purpose”

### **181 Appropriate form of movement record**

We DID clearly state our position on this to biosecurity officers and general agreement was reached but this has not been included.

We noted in the purposes in

Part 2 Purposes of Act and achieving the purposes  
4 How purposes are primarily achieved  
“providing for flexible and timely ways of minimising and mitigating biosecurity risks;

We think the wording of this aspect is very inflexible and needs to be amended.

The bill reads

For the movement record requirement, a movement record that relates to the movement of a designated animal other than a specified animal is in the appropriate form if it is a document that clearly sets out the following information and is signed by the person completing the record—

- (a) details sufficient to identify the place from which the designated animal is being moved;
- (b) where the designated animal is being moved to, and the name and address of the person who is to receive the animal;
- (c) the proposed date of the movement of the designated animal;
- (d) the species and breed of the designated animal;
- (e) details of any identification mark on the designated animal;
- (f) any illness the designated animal is known to be suffering, or any illness the person who created the movement record reasonably suspects the designated animal may be suffering;
- (g) other information prescribed under a regulation

1. **Signed** is inflexible if a person is making an application for movement over the phone or on the web how does the person sign, is it necessary other than identifying who the person is?
2. Name and address of the person receiving the animal is often unknown, for example if we move a horse to say Darley Stud in the hunter valley, they have literally hundreds of staff and the principle over Darley is a sheik in the Royal family of Saudi, the address is necessary
3. **“Details of any identification mark on the designated animal”** This issue was discussed in detail and agreement was reached (and biosecurity officers were involved in the discussions). The wording should be

“an industry recognised method of identifying the animal or details of any identification mark on the designated animal;

<p>WE are very adamant on this issue, the reason for this is that for example thoroughbred horses are named and a comprehensive data base for such is maintained by industry, there can only be one Black Caviar there is no need to list this horses brands, colour and markings. When a Hendra vaccination rolls out horses will be microchipped and a database maintained with a microchip number or the industry identification name associated with that number.</p> <p>The issue of indentifying marks is also in section “185 Show organiser to record designated animal movements” and this could also be changed.</p> <p>The issue of documents and the form of a document wether it is paper or web based or electronic may also need to be addressed under the following</p> <p style="padding-left: 40px;">106 Requirement to answer question or give information \</p> <p style="padding-left: 40px;"><i>required document</i>, for an individual, means a document that has been issued to the person, or that the individual is required to keep, under this Act</p>	
<p><b>Right of Appeal and or a Review Mechanism, and method for making such application</b></p> <p><b>Biosecurity decisions based on economic analysis</b></p> <p>The bill relies on recommendations from the CEO and or at the ministers direction for many biosecurity actions, for example,          Declaration of a biosecurity zone          Declaration of biosecurity matter, what is controlled, prohibited matter declaration, restricted matter declaration , declaring a biosecurity emergency etc          For example see:              “Part 2 Movement control orders              110 Chief executive may make movement control order.</p> <p style="padding-left: 40px;">The chief executive may make a movement control order only if the chief executive is satisfied on reasonable grounds that the controlled biosecurity matter under the order poses a biosecurity risk of enough seriousness, and that the risk is high enough, to justify the making of the order.”</p> <p>But the justification for undertaking this is based on a premise that the action is required for “significant biosecurity risk” but it does not define what significant is and what measure should be taken to determine the risk. Does the risk hold up to economic scrutiny, is the risk an industry shared risk. There is no requirement for a RIS and as such a major check and balance approach is forgone this may not be the best way to have legislation.</p> <p><b>Why do we need an appeal mechanism</b></p> <p>Example EI          The Equine Influenza outbreak was caused by a failure of biosecurity at a quarantine facilities, as such the Federal government was the primary cause and thus came a responsibility to eradicate and control. What industry learnt was that the cost to industry was enormous for a disease with limited economic impact and very little animal impact. If a disease of this nature was occur again industry would have to argue that an eradication program not worth the cost.</p>	<p><b>Many sections, Too numerous to list but if required more detail can be provided</b></p> <p>for example</p> <p>Part 3 Biosecurity zone regulatory provisions (our tick example would relate to this when wide spread chemical resistance was identified we appealed for changed but got no where!!)</p>

### Example Cattle Ticks

For the past 20 years the horse industry has been forced to undertake cattle tick management protocols with no way of making appeal against such despite significant issues and failures of the system, to highlight this we have provide the following,

Controlling and eradicating cattle ticks is extremely important for the viability of the cattle industry in north-eastern NSW and eastern Queensland. Cattle ticks are the most serious external parasite of cattle in Australia. The tick can carry 'tick fever', which can kill cattle and causes significant losses to beef and dairy industries.

The current Queensland regulation is based on the *Stock Act 1915*, Stock Regulation 1988, Stock (Cattle Tick) Notice 2005 and Stock Identification Regulation 2005. Whilst attempts were made in 2005 to try to recognise changes in the nature of the cattle industry and the significant changes to the horse industry it is fair to say that the legislation is out of date and does not suit the current environment the new bill is to rectify this. The system imposes rules and regulations that paid scant regard to the economic significance of the horse industry, the safety of our livestock and the inconvenience to our businesses and lifestyles. .

Horse movements between the current cattle tick zones DO have a biosecurity risk as horses are a secondary host species which can carry cattle ticks BUT the risk is minimal. For example at the Kirra and Mt Lindsay NSW border gates operated by NSW DPI staff, in the past 12 months for the 6296 horses inspected 2 carried cattle ticks and a further 7101 travelled on a low risk permit. This is a risk rate of 1 in 10,000 very low.

The problems for the horse industry with the current system are;

- Horse owners charged \$250,000 to \$500,000 dollars in fees and charges for horse cattle tick movements per annum. This charge is unfair to the horse industry as the cattle industry is the primary beneficiary. Expenditure at this level by the horse industry could be directed to projects that benefit the horse industry.
- In regard to cattle ticks on horses
  - Almost all horse movements are low risk for cattle ticks, Racehorses and horses stabled in and daily groomed for competition pose virtually no risk at all but all these horses travelling for greater than 5 days must be inspected and sprayed at the biosecurity zone border, (this was even case Black Caviar when the mare raced last year Brisbane and was stabled inside the Eagle Farm Race track)
  - Statistics show that only 1 horse in 10,000 are a cattle tick risk The Queensland horse industry believes it is a better use of resources to focus on the 1 in 10,000 horse and use a quality assurance system to identify these high risk horses
  - All horses travelling greater than 5 days must be sprayed with acaricide chemicals. Horses have had adverse reactions and in example cases racehorses and competition horses have been unable to race (Star of Florida for trainer Pat Duff) or compete.
  - To add horse industry discontent to the issue spraying is ineffective as **most ticks are resistant to the spray thus a worthless exercise.**
  - Spray gate facilities are very unsafe. Horses have been seriously injured and at least 1 horse had to be destroyed by a Racing Queensland veterinary.
  - The tick gate facilities are very inconvenient they effect travel times for transport and limit safe transport
  - The tick gates have no loading facilities or barrier gates and the facilities do not provide safe holding yards or stallion yards and fences are not designed for foals. Often trucks and floats are required to park on roadways and parking facilities are inadequate with poor barriers to roadside traffic and potential horse disturbance and fright.
  - The concrete floors a smooth and surfaces are unsafe for effective

<p>handling and ramparts and corners do not have rubber lined safety guards.</p> <ul style="list-style-type: none"> <li>- The tick gates regulations require horses to be tractable which for foals at foot is near impossible to achieve and weanlings yearlings and other young stock have not had the life experience to deal with the tick gate environment</li> <li>- There are issues with occupation health and safety and chemical compliance and it is anticipated that sooner or later legal action will be taken by a horse owner.</li> </ul> <p>FOR THESE REASONS we were desperate to get change and because there was <b>no effective mechanism</b> to have the biosecurity action reviewed or to make an appeal this situation has continued for at least 10 years regardless of our vigorous and constant letter writing and requests.</p> <p><b>AN APPEAL or REVIEW mechanism must be included in the BILL</b></p>	
	<p>Part 3 Biosecurity zone regulatory provisions</p>
<p><b>Authorised Persons</b></p> <p>Industry believes the bill has failed to recognise a group of persons that undertake authorise biosecurity functions under permit and is loose in nature in the current legislations but needs to be included in this legislation.</p> <p>It is best to describe the person we highlighting and then why we think this person needs to include in the legislation.</p> <p>Maybe an Accredited person? This person is an industry person that is not an employee of or a contractor to DEEDI or a police officer or under TORUM.</p> <p>They are an independent trained industry person.</p> <p>Currently horse managers, owners and industry specialists are authorised under permit and have completed a training course and are registered to undertake a cattle tick inspection and treatment of horses and then under this inspection and treatment move across a biosecurity border. There would be many hundreds of people undertaking this task. They have not been recognised in the legislation.</p> <p>DEEDI have been informed of this issue.</p> <p><b>The action is for a section in the bill to be included similar in wording to the police section that recognises industry trained and qualified persons for biosecurity tasks.</b></p> <p>These persons to be registered on a DEEDI maintained register. These persons to have a licence renewal every say 5 years These persons to be a class below an authorised person with restricted powers for specific tasks</p> <p>In other industries other than the horse industry it could be envisaged that these persons may also exist. For example a staff member who works for a seed company maybe such a person. They may be able to undertake a certification of a consignment of seed that is free of a weed species...</p>	<p>Chapter 9 Inspectors and authorised persons Part 1 General matters about inspectors and authorised persons Division 1 Appointment of inspectors</p>

<p><b>If this aspect is not included in the legislation there will be many persons currently disenfranchised from the system.</b></p> <p>It make sense to have industry involved in self regulation and this regulation to be controlled and registered, why not recognise this in the bill?</p>	
<p><b>Animal Safety and Handling Standards</b></p> <p><b>Biosecurity CHECKPOINTS animal handling standards</b></p> <p>100 Matters for inclusion in biosecurity emergency order</p> <p>The bill reads</p> <p style="padding-left: 40px;">a) establish checkpoints (<i>biosecurity emergency checkpoints</i>) within or near the biosecurity emergency area for the order</p> <p>Industry believes that recognition of OHS, Animal safety and welfare and specifically the needs of horses and young stock has been poorly considered with the establishment of current biosecurity check points.</p> <p>Check point gates have been subject to serious issues as described above in this submission</p> <p>We submit that the bill to include the wording as follows</p> <p style="padding-left: 40px;">b) include objective criteria to apply for the stopping and checking of vehicles at the biosecurity emergency checkpoints... criteria <b>to include OH&amp;S animal safety and welfare and handler and animal safety to the highest recognised industry standards</b>".</p> <p>Horse deaths and injuries have and are occurring at biosecurity check pints under the current legislation industry believes the DEEDI standards for expensive livestock are atrocious compared to the standards on our own properties.</p> <p>The issue is also relevant to</p> <p style="padding-left: 40px;">103 Power to stop vehicles</p> <p style="padding-left: 40px;">(1) An inspector who is also a police officer, or an authorised transport officer, may require the person in control of a vehicle to stop the vehicle at a biosecurity emergency checkpoint, having regard to the objective criteria applying for the stopping and checking of vehicles at the checkpoint.</p> <p style="padding-left: 40px;">(2) An inspector who is also a police officer may require the person in control of a vehicle to stop the vehicle other than</p> <p style="padding-left: 80px;">Chapter 5 Managing biosecurity emergencies and risks Part 1 Biosecurity emergencies Page 105</p> <p style="padding-left: 40px;">a biosecurity emergency checkpoint if the inspector suspects on reasonable grounds that—</p> <p style="padding-left: 80px;">(a) the vehicle may be being moved in contravention of a biosecurity emergency order; or</p> <p style="padding-left: 80px;">(b) the vehicle may be being used to carry biosecurity matter or a carrier in contravention of a biosecurity emergency order.</p> <p style="padding-left: 40px;">(3) A requirement may be made under subsection (1) or (2) in a way prescribed under a regulation.</p> <p><i>Example—</i></p>	<p>Chapter 5 Managing biosecurity emergencies and risks Part 1 Biosecurity emergencies</p>

<p>A regulation might make provision for the display at a biosecurity emergency checkpoint or other stopping point of signs that can be easily read and understood by the person in control of a vehicle.</p> <p>(4) A person must comply with a requirement under subsection (1) or (2) unless the person has a reasonable excuse</p> <p>The wording</p> <p><b>“OH&amp;S, Animal Safety and Welfare and Handler Safety to the highest recognised industry standards”</b></p> <p>included where appropriate in the bill.</p>	
<p><b>322 Compensation</b></p> <p>(1) A person may claim compensation from the following if the person incurs loss because of the exercise, or purported exercise, of a power by an authorised officer including a loss arising from compliance with a requirement made of the</p> <p>Industry believes the issue of compensation needs to be reconsidered and is NOT adequate under this bill This is especially relevant after the ombudsman’s report which was made after the drafting of this legislation.</p> <p>Compensation for the destruction of animals under a biosecurity program/action and compensation for a business as a result of a quarantine was highlighted in the report.</p> <p>Clearly the value of the destroyed horse “Tamworth” was poorly handled and industry believes this issue needs to be far more robust in its guidance in the bill.</p> <p>The losses incurred by the Redlands Bay Vet clinic are substantial and the issue of exgratia payments for such losses needs to be addressed in the bill. The current wording does not recognise these 2 issues.</p> <p>In addition compensation for horses as described in</p> <p>330 What is notional value or notional reduction in value of property.</p> <p>(1) The <i>notional value</i> of property that is the subject of loss is the amount that would have been received for the property if, at the place where it was destroyed, it had been sold under a lawful direction immediately before it was destroyed.</p> <p>Horses are not valued by their meat value!! The valuation of a horse should be based on an “auditable cost base”</p> <p>For example if I pay \$15000 for a service fee to my mare and I had purchased that mare for \$20,000 and had incurred costs of 10,000 for the breeding and ownership of that mare she is worth \$45.000. She is not worth 100,000 because this is what I could get for the foal when sold as a yearling, but when the foal is born it is worth the costs to breed the mare plus the foaling costs and the cost of the service fee not what I could sell it for. A similar value can be obtained for most other horses.</p> <p><b>This is a major issue for the horse industry.</b></p> <p>The bill should not opt out of compensation as is the case for some of the wording and as is the wording now legally we believe compensation may be limited and unfair.</p>	<p>Biosecurity Bill 2011 Page 14 Division 2 Compensation</p> <p>Chapter 10 Compensation for loss or damage from biosecurity response 330 What is notional value or notional reduction in value of property</p>
<p><b>COST SHARING by biosecurity beneficiaries</b></p> <p>Whilst the legislation has general obligation which applies to any person dealing with</p>	<p><b>COST SHARING</b></p> <p>Issue unclear in</p>



<p>a biosecurity matter that poses a biosecurity risk it does not state that the cost should be apportioned to a non-beneficiary or that it should be to the economic and social detriment of the ancillary participant (secondary host species)</p> <p>The bill does not define this aspect in the bill</p> <p>The issue can be made clearer by examining the current issues with cattle ticks</p> <p>The primary responsibility for cattle tick biosecurity should be assigned to the cattle industry. Cattle Tick zones and the imposts imposed on the horse industry serve <b>no benefit</b> to the horse industry and are principally for the benefit of the cattle industry. The horse industries view is that an economic analysis of the current cattle tick biosecurity investigating the costs and impacts of controls on horse movements will yield a result that highlights the significant costs horse owners and government currently incur for the very small risk/return. The calculated annual cost to the horse industry is \$500,000; in fees and this is effectively a subsidy from the horse industry to the cattle industry.</p> <p>Further <b>Beale</b> is specific about cost recovery and resourcing biosecurity the report states;          “The general principle should be that Australians who use or consume high risk, high regulatory cost imports, pay for those costs, rather than taxpayers” , “Equally, ...those who earn income from markets as a consequence of the regulatory services provided by the Australian government should pay for them”</p> <p>An application of this principle to cattle tick biosecurity clearly indicates that the cattle industry being the primary beneficiary of the cattle tick biosecurity should be the primary agent in cost sharing arrangements.</p> <p>The horse industry is mutually exclusive, that is it derives no benefit from cattle tick biosecurity and as such should not pay for any costs, or for services provided by government.</p> <p>We wish to note that cattle ticks are OUTSIDE Emergency Animal Disease Response Agreement (EADRA) and are a biosecurity program under the state system.</p> <p>We note that there is a disease in horses in the UK Epizootic Lymphangitis that is very significant for horses, it is carried by cattle but does not affect cattle. The horse industry would not expect the cattle industry to pay for the control of or any aspects of inspection and testing for this disease if it were or a similar disease were to become an issue.</p> <p><b>Clearly legislation needs to include information about cost sharing and apportionment of such costs and BE FAIR as it is not the case now.</b></p> <p>We can only find one area in the bill that specifies fees and this is          388 Fees          A regulation may provide for the fees payable for the giving of a biosecurity certificate by an authorised officer who is also an accredited certifier..</p>	<p>location in legislation may relate to section</p> <p>Division 2          Recovery of costs and expenses          370 Recovery of costs of taking steps under biosecurity order or action under direction and or</p> <p>Division 3          Recovery of costs from other persons          372 Recipient may apply for contribution</p>
<p><b>Regulatory impact Statement</b></p> <p>The wording here is a cop out for good decision making, the ombudsman’s report and the EI case clearly show that without a RIS poor decisions can be made.</p> <p>The legislation needs to be more robust and put in place some methods for economic assessment and industry consultation as it is now biosecurity Queensland will be a loose cannon.</p>	<p>515 <b>When regulatory impact statement not required</b></p>

<p><b>We suggest an upgrade to the wording and make it necessary to consult and make and economic assessment of some sort for biosecurity programs and activities.</b></p> <p><b>515 When regulatory impact statement not required</b>          (1) This section applies despite the <i>Statutory Instruments Act 1992</i>, section 43.          (2) A regulatory impact statement need not be prepared for proposed subordinate legislation if the proposed legislation provides, or to the extent it provides, only for—          .(a) the declaration of particular biosecurity matter as prohibited matter; or          (b) the declaration of particular biosecurity matter mentioned in schedule 1, or declared to be prohibited matter under an emergency prohibited matter declaration, no longer to be prohibited matter</p>	
<p><b>Programs for Surveillance</b></p> <p><b>No definition for what is “Controlled biosecurity matter” and what is “regulated biosecurity matter”?</b></p> <p><b>What are these how do they become classed as controlled or regulated and what is the process for review consultation and industry involvement?</b></p> <p>The term “Significant biosecurity risk” is conjecture, this section mentions the biosecurity risk as the need for a prevention and control program, The problem is there is no format for determining the economic veracity of a program “is it worth doing” there needs to be a risk analysis and an economic assessment. We do not need to experience another EI crisis with such costs to gov and industry when a vaccination and or “do nothing” would be a viable option</p> <p>We believe the new legislation has failed to consider BEALE          The federal review of biosecurity <b>by Beale et.al.</b> to Australian Government clearly identifies a number of areas where the current biosecurity can be improved. Beales recommendations:          a. Biosecurity should be a <b>continuum – preborder, border and post border,</b></p> <p>The current systems used by biosecurity Queensland are based in what is called end point inspection. This method of <i>quality control</i> has been superseded over the past 20 years in nearly all agricultural industries by <i>quality assurance</i>. Programs like Cattlecare and Livestock Production Assurance in the cattle industry and Dairy Quality First in the dairy industry have been working for years and have reduced compliance costs and are very farmer friendly</p> <p>The current cattle tick biosecurity system focuses primarily on the border. This approach sends the wrong market signals the cattle industry. It draws attention away from practices on farm pre border in the cattle tick areas and on farm in post border cattle tick areas. It also penalises unrelated industries like the horse industry. In fact some of the current regulations actually impose on farm restrictions (pre border) on the horse industry, for the horse industry it is hard to understand that the regulations make horse farms do what cattle farms should do post border.</p> <p>.</p> <p>This approach is inefficient and fails to build post border capacity, post and pre-border knowledge and transfers responsibility to governments and industries</p>	<p>Chapter 8          Programs for surveillance, prevention and control</p>

<p>unconnected to the biosecurity risk.</p> <p><b>The bill does not recognise Quality assurance and the concept of a continuum</b></p> <p><b>The drafting of the legislation looks as if it is just putting in place the old system in the new BILL and we will have the same debacle and inefficacies</b></p> <p>b Biosecurity measures should be based on <b>rigorous science-based assessments</b></p> <p>For example,</p> <ol style="list-style-type: none"> <li>1. The horse industry is concerned that whilst the knowledge base around cattle tick management is substantial there has been no adequate scientific and statistical analysis of the risks associated with horse movements. This has lead to a situation where decisions have been made in establishing the current system that are based on best estimates of biosecurity officers and the opinions of members of cattle farmer committees. This situation is untenable in the future.</li> <li>2. The current Hendra research has been based on fruit bats and despite continued calls from the horse industry to focus on horse management aspects the biosecurity team continues to focus on bats. This has lead to a failure of the concept of rigorous science based assessments</li> </ol> <p>c. <b>Shared responsibility</b> (governments, industry and the broader community)</p> <p>The horse industry appreciates the concept of share responsibility and understands its role in for example cattle tick biosecurity and are prepared to contribute and have proposed a “code of practice for horse movements” but shared responsibility does not mean we should pay for the program.</p> <p>d. <b>A Risk and Return Approach.</b></p> <p>Beale is specific about cost recovery and resourcing biosecurity the report states; see above</p> <p>In the past and currently the full cost of movement restrictions have been carried by the horse industry with no dispensation from the cattle industry this situation is grossly unfair and untenable in the future and against the principles outlined by Beale above.</p> <p>When costs are disassociated and imposed on an ancillary industry there is no mechanism for market signals back to the beneficiary of the regulation. Further there is no scope for efficiency measures to be implemented, where is the incentive to makes practices less expensive if another industry is paying for the activities and the benefits are effectively free. When costs are applied to beneficiary of an activity that beneficiary investigates, manages, lobbies and applies pressure to reduce those costs, as such the efficiency of the activity will be improved</p>	
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The horse industry wishes to engage further with the committee and would like to be invited to be involved in the public consultations and or to contribute further if needed. This submission is not complete but the best we can do under voluntary work commitments and limited time and we wish to reserve our option to contribute more to the committee.

I also wish to apologise for the disjointed nature of the submission but I have found it difficult to bring all the concepts, issues and concerns into the framework of the bill.

I have not made a very detailed proof of my work and also wish to apologise for this but time constraints are significant.

I would gladly provide clarification of any points and elaborate if required

Dale Anderson

A handwritten signature in black ink, appearing to read "Dale Anderson", with a small dash at the end.