



Submission Paper on
Biosecurity Determination 2017

**Ban on the Importation of
Raw Prawn Meat and Cutlets
In Australia**

Presented to Inspector General of Biosecurity

Submission Date: 29 April 2017

Submitted By: Great Ocean Foods Pty Ltd

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1. SUMMARY OF KEY POINTS

- 1.1 Determination 2017 is a blanket ban on most forms of raw imported prawns irrespective whether the prawns are disease free, or intended for cooking by commercial establishments, or not intended for sale at the retail level.
- 1.2 WSSV is not exotic to Australia, yet this forms the basis of Determination 2017.
- 1.3 The exercise of power by BA has not been appropriate and specifically adapted to achieve the purpose. That is, the powers have been overused in 2 main ways:
 - a) No geographic risk assessment measures have been considered. The presence of WSSV in the wild is scientifically acknowledged not to be an issue. Accordingly, BA laws and powers should be adapted and limited to close proximity to local prawn farms only and not the entire country.
 - b) The determination refers to unacceptable level of WSSV in imported uncooked prawns at the retail level, yet the majority of raw prawns are sold to the food service sector where the intention is to cook the prawns. The distinction between the retail and food service industry sector is of critical importance in understanding the intended use of the product. The food service sector purchases raw imported prawns with intention to cook and serve it for human consumption. Further an estimated 95% of highly processed prawns (garlic marinated prawns) are sold into the food service sector. The food service sector comprises restaurants, clubs, pubs, takeaways, caterers and fish shops all of which cook the prawns.
- 1.4 Little research has been conducted on the rate of viability of the virus in dead imported prawns, and whether the virus remains viable when introduced as bait into the environment and exposed to the variables in that environment via a reasonable and practical route of infection.
- 1.5 The reasons that Determination 2017 gives as justification for the ban has been assessed at the opposite end of the disease risk factor scale, that being the mere presence of WSSV as opposed to the multitude of other factors that relate to WSSV transmission and eventually a disease outbreak such as WSD.
- 1.6 The recommendations and findings of the Import Risk Analysis (IRA), into imported prawns which in large part has formed the basis for Biosecurity policy, protocols and management conditions since 2010 have been deemed invalid, void and insufficient by Determination 2017. This is extraordinary given the analysis was conducted over a 10 year period, and the cause of the WSD outbreak in the Gold Coast remains unknown.

- 1.7 There are several Critical Control Points in the “Bait Pathway” which would significantly reduce the risk of garlic marinated prawns (‘highly processed’) being used as bait. They are noted in section 2 of this submission.
- 1.8 We seek transparency in the information provided by the BA and the CSIRO when publishing WSSV test results and Ct values. See section 3 of this submission.
- 1.9 BA’s position on highly processed prawns in the form of garlic marinated prawns which were imported prior to 6 January 2017 is that they are to be re-exported, cooked in an approved arrangement or destroyed.

We have asked BA to consider our request to sell the prawns to the food service sector for cooking and human consumption purposes. The request was denied despite us being able to provide a full audit trail of who and where the product would be sold to. A copy of our request and their reply is attached.

Again, given the product was intended for the Sydney region only (which is 800km from the nearest prawn farm), we feel the response is not reasonable and is an overuse of their powers.

2. CRITICAL CONTROL POINTS IN THE BAIT PATHWAY

There are several Critical Control Points in the “Bait Pathway” which significantly reduce the risk of WSSV transmission.

Critical Control Point 1

Would a fisher purchase imported prawns heavily marinated in garlic and intended to be cooked for human consumption, instead of pre-packaged bait?

It is possible, but in our opinion highly improbable for the following reasons:

- i. Accessibility – Bait is usually purchased from bait and tackle shops, or service stations.
- ii. It is highly unlikely to be an option at all amongst experienced fishers who understand the importance of the right bait to use.
- iii. The far less common pathway for imported prawns to enter Australia’s waterway is via inexperienced fishers, however the frequency of fishing is far less.
- iv. The amount of product in a human consumption packet of prawns, which is usually a 1kg bag, would be an over the top amount of bait to purchase in the first place. Bait is far more commonly sold in 200g packs as opposed to 1kg packs.

Critical Control Point 2

Where are imported prawns most likely to be acquired from?

The answer is the retail sector and not the food service sector. The intended use of prawns in the food service industry is for cooking and serving to paying customers. Diverting prawns sold to businesses in the food service industry into bait would indeed be highly uncommon and unusual.

Critical Control Point 3

Let the prawns defrost in the bag or in a bucket, then wash off the garlic marinade and bait the hook.

The garlic marinade can be up to as much as 300g of the 1kg product and a minimum of 120g of garlic. During this period of time, the prawn and the WSSV if viable will be subject to varying temperature conditions, salinity, acidity, UV light, the introduction of other micro-organisms and the onset of autolysis which is likely to render the virus non-viable. Although there are infinite variables in these scenarios, it is nevertheless a possible practical pathway and at least some scientific research should be conducted in such circumstances, for the purpose of better understanding and determining the incidence of WSSV surviving typical handling conditions post thawing.

Critical Control Point 4

The bait pathway is via the wild and not the farm

This is the most critical control point for reducing the risks associated with the presence of WSSV in imported prawns. The incidence of WSSV and WSD outbreaks in the wild is the exception rather than the norm. It is usually associated with a one off set of environmental conditions or the transfer of WSSV infected material from a farm to the wild and not the other way round.

Critical Control Point 5

The naturally occurring considerations of what prawns feed on and how they feed

Prawns and other crustaceans are most likely to ingest micro-organisms or very small particles of food as opposed to raw imported prawns used as bait which are fresh out of a packet. For this to occur the imported prawn being used as bait would need to be in a sufficiently decayed condition which in the conditions it is subject to would most likely render the virus unviable. Even before this happens, an imported prawn being used as bait is highly likely to be subject to predation in the wild by a fish well before a crustacean would have time to ingest it.

Critical Control Point 6

Live crustaceans which are infected with WSSV in the wild get removed from the environment by via predation

Even if WSSV transmitted to a wild crustacean via ingestion via a natural route of infection in the wild, it is highly likely that the infected animal will be removed from the environment by another predator therefore reducing the risk of the virus spreading further.

To conclude, in making assessments in relation to the likelihood of disease transmission and subsequent implementation of controls to even further reduce the risk, the above Critical Control Points must be taken into account. Simply performing a lab experiment under very controlled conditions which would propagate the survival of the virus in optimal conditions and circumstances and force feeding a known highly infected prawn to a challenge prawn is very different to WSSV transmission via a reasonable and practical and natural route of infection even when introduced as bait into the environment and exposed to the variables in that environment.

3. ACTUAL DIAGNOSTIC TESTING REPORTS AND CT VALUES

For WSSV transmission to occur there must be a sufficiently high concentration of WSSV in the infected sample. As a matter of transparency, when results of PCR tests are published by Government approved laboratories, the full results including Ct values by sample should be published to stakeholders, and not just positive or negative results together with a Ct value range.

Below are the results of samples taken from our premises on 27 January 2017, noting:

B/T means Black Tiger Prawns

V means Vannamei Prawns

+ means positive test result

- means negative test result

TABLE 2

Laboratory	Specie Type	AAL		CSIRO (AAHL)					
		Taqman PCR		Taqman PCR – OIE		Decapod PCR - OIE		Taqman PCR - CSIRO	
Test Method		+ or -	Ct	+ or -	Ct	+ or -	Ct	+ or -	Ct
Sample No.	B/T or V								
1	B/T	+	32.36	+		+		+	
2	B/T	+	39.89	+		+		+	
3	B/T	+	32.63	+		+		+	
4	B/T	+	34.79	+		+		+	
5	B/T	+	37.01	+		+		+	
6	B/T	+	30.99	+		+		+	
7	V	+	39.82	+		+		+	
8	V	+	38.71	+		+		+	
9	V	-	40+	+		+		+	
10	V	-	40+	+		+		-	
11	V	+	37.32	+		+		+	
12	V	-	40+	+		+		+	
13	V	+	38.58	+		+		+	

Biosecurity officers were asked to take samples out of the same bags and send it for testing to both:

- i. Advanced Analytical Laboratories (AAL), and
- ii. Australian Animal Health Laboratory (AAHL)

The submitted samples were accepted for examination by AAL and the results are above.

The submitted samples were also accepted by AAHL and the results are in the table above noting only positive or negative results are provided specific to a sample. The Ct values were not provided per sample. Rather, a general overview of the Ct values were provided which is noted below:

“The submitted samples were processed for examination by the CSIRO and the OIE WSSV-specific qPCR assays and were all test-positive with Ct values in the range 23.73-40.31 (with the exception of sample 10). Using the CSIRO assay, the duplicates of sample 10 produced Ct values of 40.44 and undetermined (>45.00) and therefore was deemed POSITIVE. Using the OIE assay, sample 10 was test-negative (Ct>45.00). All positive and negative controls produced expected results”.

We made several requests to AAHL and the Department of Agriculture for specific details of Ct values per sample. After 2 weeks, we received the following response from the Department of Agriculture.

“Thank you for your follow up request for an AAHL report containing raw CT values.

The department has contacted AAHL who have advised that CSIRO and OIE WSSV molecular assays used at AAHL are accredited by NATA (National Association of Testing Authorities, Australia). For all assays under AAHL’s NATA accreditation, the only individuals authorised to interpret the raw data are approved signatories (or delegates), who are recognised by NATA as being proficient for assessing the data and determining the test result.

The test result (e.g. ‘positive’, ‘negative’) is assigned for any given sample based on information submitted to NATA in the course of validation of this assay. Appropriate assessment of the raw data cannot be made in isolation of either the validation dossier or the relevant laboratory specific test methodology. As such, AAHL does not provide raw data to third parties.

We believe this response is not acceptable given that we are an industry stakeholder along with many other businesses, which have been adversely affected by Determination 2017. We seek transparency in the information provided by the Department as well as the likelihood of transmissibility of WSSV at the higher Ct levels being 37-40 and most recently 45 which appears to be the new limit set by BA.

4. BIOSECURITY DETERMINATION 2017

In bold below is an extract from Biosecurity (Suspended Goods – Uncooked Prawns) Determination 2017 from the Director of Biosecurity outlining the reasons for the ban.

Our response immediately follows each point of the Determination.

For subsection 182(5) of the Act, my reasons for making this determination are as follows:

(a) I am satisfied that uncooked imported prawns (including prawn meat) represent an unacceptable level of biosecurity risk, applying Australia's ALOP, for the following reasons:

(i) Excepting the current outbreak, WSSV is exotic to Australia.

- This is incorrect. WSSV is not exotic to Australia. WSSV is naturally occurring in the wild in Australia and all over the world. WSD has been exotic to Australia until now.

(ii) All prawn species imported into Australia are susceptible to infection with WSSV and WSSV is capable of surviving freezing, storage and transport to Australia.

- Agree that all prawn species imported into Australia are susceptible to WSSV infection. While WSSV is capable of surviving freezing, further transmission has only been achieved under controlled laboratory conditions.

(iii) Therefore there is a high likelihood that WSSV could enter Australian territory with imported uncooked prawns.

- Agree.

(iv) The use of imported uncooked prawns as bait in recreational fishing carries a likelihood of infecting crustaceans, including farmed prawns, in Australian river systems.

- The extent of the likelihood has not been quantified. Nor has the likelihood of highly processed prawns such as heavily garlic marinated prawns been mentioned by distinction. Notably, imported raw garlic prawns are also banned.
- The risk of WSSV transmission when introduced as bait into the environment and exposed to the variables in that environment has not been ascertained.

(v) Imported prawns are used as bait or berley by fishers.

<ul style="list-style-type: none">• Again there is no distinction made between the class of goods namely non-highly processed prawns and highly processed prawns being used as bait. The distinction is important from a risk analysis point of view and should not be disregarded by classifying everything under one banner namely - "Imported Prawns". Making such broad classifications is not appropriate.
<ul style="list-style-type: none">• Further there is no scientific assessment presented to support whether the presence of WSSV and even more importantly, whether the concentrations of WSSV in these prawns are of a sufficient level and viability to support the perceived high risk that WSSV in imported prawns is capable of transmission when introduced as bait into the environment and exposed to the variables in that environment.

(vi) This means there is the potential if WSSV enters Australian territory with imported uncooked prawns, that it will become established in Australian territory. This likelihood is moderate for farmed prawns.

<ul style="list-style-type: none">• The likelihood of WSSV becoming established in the Australian territory in the wild because of raw imported prawns is undetermined.
<ul style="list-style-type: none">• Whether WSSV becomes established in a farm is subject to its own and distinct risk factors which are highly dependent on farming practices and environmental conditions (i.e. temperature etc.), as opposed to introduced pathogens via imported prawns.
<ul style="list-style-type: none">• The 'likelihood is moderate for farmed prawns – How was this determined and what are the specific reasons? Do these reasons take into account existing farming practices, better management practices and specific critical control points within the pathway identified?
<ul style="list-style-type: none">• The potential that the 'bait pathway' will lead to the establishment in Australian territory has to be quantified not merely inferred.

(vii) Where WSSV becomes established in a location, it is likely to spread by both natural distribution, including carriage of crustaceans by birds, and through commercial distribution.

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| <ul style="list-style-type: none">• Agree. Tighter controls on farm practices in Australia should be implemented in the first instance especially given that's where WSD is now. WSSV is currently in the wild territories via local farmed prawns. WSD up till now is not in the wild. |
| <ul style="list-style-type: none">• Define location. In the wild, natural processes will occur to dissolve the occurrence of a WSD outbreak by dissipation and predation of the affected crustaceans. This is not case in a farmed environment. |
| <ul style="list-style-type: none">• Carriage of infected crustaceans by birds is a possible pathway that WSSV can spread by natural distribution. Importantly, this pathway is equally applicable to crustaceans infected with WSSV via naturally occurring conditions in the wild and those with farm originated infections, in Australia. |

(viii) WSSV has the potential to cause harm to animal health. WSSV has a wide host range and can infect many life stages of crustaceans. Prawns, freshwater crayfish and other crustaceans known to be susceptible to WSSV infection are common in freshwater and marine environments throughout Australia.

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| <ul style="list-style-type: none">• The potential to cause harm to animal health in the wild is usually or if not always associated with close proximity to an infected prawn farm. |
| <ul style="list-style-type: none">• In fact the majority of the prawns that have been identified in the wild namely the Logan River and tested positive for WSSV are the same farmed species that exist in the Gold Coast farms and are not those normally found in the natural marine environment of the area. |

(ix) The entry, establishment and spread of WSSV has the potential for economic consequences in the form of serious prawn aquaculture losses in the domestic industry. Australian prawn aquaculture has a value of \$86.3 million in 2014-15.

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| <ul style="list-style-type: none">• As this is a politically one sided economic point and not a scientific point, one has to question its purpose for inclusion in such a determination. |
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(b) Further, recent investigations have identified that:

(i) There is an unacceptable level of WSSV in imported uncooked prawns at the retail level. These uncooked prawns had been inspected, tested and cleared for entry into Australia.

<ul style="list-style-type: none">• Again no distinction has been made between the class of goods namely non-highly processed and highly processed prawns.
<ul style="list-style-type: none">• An Import Risk Analysis (IRA) on prawn imports was implemented in 2010. The IRA sets out a number of mitigation methods to manage the biosecurity risk of WSD to a very low level including import permit requirements, border testing, and end use restrictions. The predominant focus of Determination 2017 is on the presence of WSSV and not WSD which is different to the IRA.
<ul style="list-style-type: none">• If the retail level is where most of the perceived risk is, then introduce commensurate risk measures at the retail level.

(ii) Fishers have been using imported uncooked prawns for human consumption as bait. Observations by the department's compliance officers in Queensland confirm this has occurred recently and that the prawns being used were found to be WSSV positive.

<ul style="list-style-type: none">• For clarification were the fishers using highly processed prawns or non-highly processed prawns? A clear distinction must be made for risk assessment purposes.
<ul style="list-style-type: none">• To give context to these observations, there are several questions which are relevant to assessing risk, and the answers to them should be provided for transparency purposes. See below:<ol style="list-style-type: none">i. When and how were these persons identified?ii. At what part of the river were they observed fishing and was it in close proximity to the prawn farms affected by WSD?iii. Who are these persons and how many were there?iv. Which specific prawns were they using as bait?v. Where were the prawns purchased from?vi. Were the prawns imported by one of the rogue importers?vii. In what condition were the prawns in immediately prior to the point of sampling?viii. Were samples taken of prawns which were actually handled and used as bait?ix. What were the results of Ct levels in the samples taken?x. How often have fishers been observed by the Department using imported prawns as bait?

(c) WSSV could therefore potentially enter, establish itself, and/or spread in Australia through uncooked prawns imported for human consumption and subsequently used as bait.

- We are of the opinion the use of imported prawns as bait needs to be critically analysed as a valid or likely pathway for WSSV transmission. It is further pointed out that the use as bait in the wild resulting in transmission of WSSV leave alone a WSD outbreak is subject to numerous variables all of which are likely to render the WSSV non-viable well before it has a chance of being transmitted. The Prawn IRA, 2009 makes reference to this.
- Again, there is no identification of the specific critical control points in the 'bait pathway' whereby the presence of WSSV leads to WSD. The focus should be on risk of WSSV transmission rather than mere presence of WSSV.
- This conclusion is unsupported by quantitative scientific evidence.

(d) An outbreak of WSD of unknown aetiology has occurred in the Logan River in Queensland. The cause of this outbreak is being further investigated.

- Noting the Directors comments that the Determination to ban imported prawns is not related to the WSD outbreak in QLD and then specifically identifying and including the WSD outbreak in Queensland in the reasoning for the import ban, when the CAUSE IS UNKNOWN, is causative by inference and inappropriate.

(e) On the basis of the above information I am satisfied that existing import conditions are insufficient to provide the high level of sanitary protection needed to reduce the biosecurity risk presented by WSSV on imported uncooked prawns to a very low level, in accordance with the ALOP for Australia. A temporary suspension of the importation of uncooked prawns will allow for a review of risk management conditions and compliance arrangements and for the results of that review to be implemented.

The 'bait pathway' in the 2009 IRA is described as being an unlikely transmission pathway, yet in the absence of any further qualitative or quantitative scientific evidence to the contrary, by the department, the 'bait pathway' is embraced in this determination to support its position. On this basis to then conclude that all existing import conditions founded on the 2009 IRA are deemed insufficient is extraordinary.

This determination is an inappropriate overuse of power and without proper consideration of adaptive alternatives.

5. SUGGESTED MANAGEMENT CONSIDERATIONS AND CONTROL MEASURES

The levels at which these controls may be directed are:

- Pre Border Level
- Post Border Level
- State Border Level
- Regional Border Level
- Business Level
- Product Level
- Biosecurity Level

A suggested WSSV Risk Control Measure Matrix is noted over the page. Importantly, the matrix has been developed on the basis of addressing big risks first, then chunking down the remaining risks into smaller and smaller constituent parts of manageable risk for the purpose of achieving a very low risk for Australia, but not zero. Another way of expressing this, is throwing a series of nets to capture something of varying sizes and forms. In relation to WSSV, the first net has large grid like structures to capture the big risks, with each successive net having smaller and smaller grid like structures to capture the remaining smaller risks. The proposed matrix overleaf is a **system** of risk control, with proper implementation of the entire system being stronger than aggregation of each constituent part.

Measures which are not in bold already exist. Measures in BOLD are recommended enhancements to existing measures.

14.3 WSSV RISK CONTROL MEASURES MATRIX

CONTROL LEVEL	NON-HIGHLY PROCESSED		HIGHLY PROCESSED	
	PRIMARY MEASURES	SECONDARY MEASURES	PRIMARY MEASURES	SECONDARY MEASURES
Pre-Border	WSSV Test Result Certificate from supplier (i)	Manufacturers Declaration setting out reasons why there is a high likelihood the prawns are WSSV free (ii)	N/A as highly processed product	Manufacturers Declaration confirming prawns are highly processed (as per existing BICON requirements)
	HACCP program to be a condition upon applying for an Import Permit	Review compliance with permit conditions and revoke if necessary	HACCP program to be a condition upon applying for an Import Permit	Review compliance with permit conditions and revoke if necessary
Post-Border	Concurrent Seals intact inspections and samples sent to an accredited lab for WSSV testing, Determination is final Every shipment	Confirmatory tests to be performed by AAHL using same test method as accredited lab, on a random basis, 1 in 25 shipments	Concurrent Seals Intact inspections and Prawn Verification, as per existing procedures on a random basis, 1 in 10 shipments (iii)	N/A as highly processed product
	Prawn Sampling Declaration Form to include “species” of prawns declaration (iv)	Species verification compared to declaration to be performed by an accredited lab, on a random basis, 1 in 25 shipments (v)	N/A as highly processed product	N/A as highly processed product
	Reasonable cause to suspect breach of Biosecurity Laws - Targeted reviews of product in Approved Arrangements and samples sent for WSSV testing (vi)	Periodic reviews of product in the Retail sector, with samples sent for WSSV testing, Random basis. Results published on BICON website (vii)	Reasonable cause to suspect breach of Biosecurity Laws - Targeted reviews of product in Approved Arrangements and Prawn Verification	Periodic reviews of product in Approved Arrangements for Prawn Verification, Random basis. Results published on BICON website (vii)

CONTROL LEVEL	NON-HIGHLY PROCESSED		HIGHLY PROCESSED	
	PRIMARY MEASURES	SECONDARY MEASURES	PRIMARY MEASURES	SECONDARY MEASURES
State Border	Nothing suggested, as likely to be ineffective	Nothing suggested, as likely to be ineffective	Nothing suggested, as likely to be ineffective	Nothing suggested, as likely to be ineffective
Regional Border	Disallow retail shops to sell raw imported prawns within 40km radius of a prawn farm (viii)	Periodic reviews of product in the Retail sector within 40km radius of a prawn farm, Random basis	Disallow retail shops to sell raw imported prawns within 40km radius of a prawn farm (viii)	Periodic reviews of product in the Retail sector within 40km radius of a prawn farm, Random basis
Business or Shop Level	HACCP program to specifically address WSSV issues namely, who to sell to, use of product in proximity to prawn farm, must be sold in original packaging for retail sale, or cooked prior to retail sale (ix)	HACCP programs should: i. List penalty measures for breaches of biosecurity laws, and ii) be audited by Biosecurity or Food Safety Inspectors for understanding and compliance	HACCP program to specifically address WSSV issues namely, who to sell to, use of product in proximity to prawn farm, must be sold in original packaging for retail sale, or cooked prior to retail sale (ix)	HACCP programs should: i. List penalty measures for breaches of biosecurity laws, and ii) be audited by Biosecurity or Food Safety Inspectors for understanding and compliance
Product Level	N/A as tested to be WSSV free	Labelling statements – i. For human consumption only, not to be used as bait ii. Must be sold in original packaging for retail sale, or cooked prior to retail sale (x)	Minimum pack size for garlic marinated prawns – 2kg (xi)	Labelling statements – i. For human consumption only, not to be used as bait ii. Must be sold in original packaging for retail sale, or cooked prior to retail sale

CONTROL LEVEL	NON-HIGHLY PROCESSED		HIGHLY PROCESSED	
	PRIMARY MEASURES	SECONDARY MEASURES	PRIMARY MEASURES	SECONDARY MEASURES
Biosecurity Level	Rotation of Biosecurity staff when doing inspections (xii)	Internal audits	Rotation of Biosecurity staff when doing inspections and verifications (xiii)	Internal audits
	Conduct Data Trend Analysis to identify possible breaches of Biosecurity measures (xiii)	Conduct further sampling tests or investigations if breaches are suspected	Conduct Data Trend Analysis to identify possible breaches of Biosecurity measures (xiii)	Conduct further sampling tests or investigations if breaches are suspected

	Specific Notes		Specific Notes (continued)
(i)	The purpose of the certificate is to provide a level of comfort to Biosecurity that the product is WSSV free.	(viii)	40 km radius is consistent with current Biosecurity policy following the recent WSD outbreak
(ii)	The reasons would give some level of assurance, or corroboration for the results noted in (i) above	(ix)	Can be easily incorporated into HACCP programs and audited
(iii)	The current verification rate is approx. 1 in 4 shipments. It's been reduced to 1 in 10 because of a more comprehensive overall system, therefore reducing work for Biosecurity	(x)	Discourages thawing and washing highly processed prawns for sale at a retail level in small quantities for bait purposes
(iv)	The onus is on the importer to correctly declare the species of prawns to discourage sample substitution	(xi)	2kg pack discourages fishers purchasing the most common form of highly processed prawns because of larger volume and cost
(v)	Species verification to be done to attest for declarations	(xii)	To reduce the risk of collusion between the importer and Biosecurity officers
(vi)	Reasonable cause must be based on sound evidence	(xiii)	Trend Analysis is simple and can be effective in identifying unusual patterns indicating compliance breaches
(vii)	Public statements will encourage awareness and compliance		

Thank you for allowing us to participate and we would welcome an opportunity to meet with you to discuss this submission further and to assist in developing policy that most appropriately addresses the risk.

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