

REPORT OF THE INTERIM INSPECTOR GENERAL OF HORSE IMPORTATION

Dr. Kevin J. Dunn – Interim Inspector General of Horse Importation

29 April 2009

The role of Interim Inspector General of Horse Importation was established to provide independent advice on domestic post-arrival quarantine facilities, domestic airport horse arrival and ground transport quarantine procedures and international pre-export quarantine facilities used for the importation of horses into Australia.

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Table of Contents

| | |
|---|----|
| Abbreviations and special terms used in this report | 1 |
| Executive Summary | 2 |
| 1 Introduction | |
| 1.1 Reason for work/objective of the audits | 3 |
| 1.2 Audit approach used..... | 3 |
| 1.3 Alignment with other related initiatives..... | 4 |
| 2 Key Findings and Recommendations | |
| 2.1 Post-Arrival Quarantine (PAQ) Arrangements | |
| 2.1.1 Airport Clearance of Horse Import Shipments | 6 |
| 2.1.2 Transport of Imported Horses to the PAQ Facility..... | 6 |
| 2.1.3 Post Arrival Quarantine Facilities..... | 6 |
| 2.2 Pre-Export Quarantine (PEQ) facilities and their operations in overseas countries | |
| 2.2.1 Generic Findings and Recommendations at a Country Level | |
| (a) Temporary Suspension of Certain Arrangements to Import Horses from the United Arab Emirates..... | 8 |
| (b) Adequacy of construction standards of a PEQ facility for cleaning and disinfection..... | 9 |
| (c) Nasopharyngeal swabbing in testing for equine influenza..... | 9 |
| (d) Indoor exercise Areas in PEQ facilities..... | 10 |
| (e) Use of Official Seals on Ground Transport Vehicles..... | 11 |
| (f) Certification of health status of premises of origin of horses in PEQ..... | 12 |
| (g) Documented Operational Procedures in accordance with HACCP..... | 12 |
| 2.2.2 Specific PEQ Findings & Recommendations at a Facility Level | |
| (a) Chain of custody of samples collected for testing from a PEQ facility | 13 |
| (b) Proposed use of an outdoor sand-floor exercise area that is also used by non-PEQ horses..... | 14 |
| (c) Separation from non-PEQ horses during loading onto ground transport..... | 14 |
| (d) Separation of PEQ horses undergoing race-track training from safety attendants mounted on local horses..... | 15 |
| Attachment 1 | 17 |
| Attachment 2 | 19 |

ABBREVIATIONS & SPECIAL TERMS USED IN THIS REPORT

| | |
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| AQIS | Australian Quarantine and Inspection Service |
| BA | Biosecurity Australia |
| HACCP | Hazard Analysis and Critical Control Points |
| PAQ | Post-arrival Quarantine |
| PEQ | Pre-export Quarantine |
| USDA | United States Department of Agriculture |

Executive Summary

The position of Interim Inspector General of Horse Importation was established by the Department of Agriculture, Fisheries and Forestry. It is a key part of the Australian Government's response to the 2008 report of the Equine Influenza Inquiry, conducted by the Hon. Ian Callinan AC.

This report details the key activities undertaken, together with findings and outcomes, during the period since my commencement in the role of Interim Inspector General of Horse Importation on 19 September 2008.

In fulfilling my role and responsibilities as the Interim Inspector General, I have undertaken audits and inspections of the facilities and operations at each of the three post-arrival quarantine stations within Australia; Sydney and Melbourne international airports; and pre-export quarantine facilities within seven countries or administrative regions (namely Hong Kong and Macau).

Periodic briefings detailing the key findings and outcomes of my audit and inspection activities were provided to the Australian Quarantine and Inspection Service (AQIS) and Biosecurity Australia (BA) throughout the course of my work program.

In general, I have observed that BA and AQIS have undertaken a large amount of work to effect improvements to the system of horse importation since Commissioner Callinan delivered his report of the Equine Influenza Inquiry. I have found that the effectiveness and integrity of the current importation arrangements has been substantially strengthened as a result of these efforts. Useful examples of significant improvements include the introduction of better techniques to obtain accurate samples from horses for equine influenza in the pre-export and post-arrival quarantine periods, and the implementation of rigorous decontamination measures, including showering, for personnel who enter the horse handling areas at arrival airports and post-arrival quarantine stations in Australia.

In relation to the audits and inspections of individual post-arrival quarantine facilities in Australia and pre-export quarantine facilities overseas, I have found no critical defects in compliance with documented Australian import requirements.

However several elements have been identified where the level and consistency of compliance should be improved through the clarification of particular standards that need to be met. For example, the structural standards of stables in pre-export quarantine facilities need further clarification to assist facility operators in complying with Australian disinfection requirements. Improved descriptions of required sampling techniques would also lead to an increased level of compliance by overseas veterinarians when testing for equine influenza.

Several elements have been found in overseas pre-export quarantine facilities and their operations where improvements are needed to fully comply with Australian requirements. Findings of this nature are to be expected and serve to add a continuous improvement aspect to import procedures and biosecurity outcomes.

Key findings and recommendations have been included in the body of my report.

1 Introduction

1.1 Reason for work/objective of the audits

Following the outbreak of equine influenza in Australia in August 2007, the then Prime Minister, the Hon. John Howard MP, and the Hon. Peter McGauran MP, the then Minister for Agriculture, Fisheries and Forestry, announced that there would be a full, independent inquiry into the outbreak. In September 2007, the Hon. Ian Callinan AC was appointed Commissioner to conduct the inquiry into the outbreak of equine influenza in Australia.

The Report of the Equine Influenza Inquiry and the government's response were released on 12 June 2008. The government agreed to all 38 of the report's recommendations.

Recommendation two of Commissioner Callinan's report identified the need to establish the position of the Inspector General of Horse Importation to ensure that the highest standards of biosecurity are being applied in the importation of horses to Australia. This is to be achieved through independent inspection and audit of import operations and procedures.

The government's response to the recommendations relating to the Inspector General of Horse Importation noted that, due to the time it would take to draft and implement legislation for a statutory position, the government would appoint an Interim Inspector General of Horse Importation on an administrative basis.

On 11 September 2008, the Hon. Tony Burke MP, Minister for Agriculture, Fisheries and Forestry, announced my appointment as the Interim Inspector General of Horse Importation after an open and transparent merit selection process.

Soon after my appointment as the Interim Inspector General of Horse Importation, a Charter was developed to articulate clearly the mission and scope of the role, accountability, independence, authority, responsibility, reporting and communication requirements and standards of practice. A copy of the Charter is provided at Attachment 1.

1.2 Audit approach used

A systems audit approach was used to undertake audits and inspections of facilities and operations. While this aligns with a quality systems approach, it has been applied on a best fit basis to date. This is mainly because the operating procedures used in the pre-export stages of the import processes of horses are in transition to being documented in line with Hazard Analysis and Critical Control Point (HACCP) or equivalent quality system principles.

Until that point is reached where all critical control points are identified, critical limits determined and Standard Operating Procedures are formally documented in a HACCP approach through the import processes, the more general system audit approach will be used. By their nature such audits rely on a significant level of subjective assessment.

The essential inspection reference used for auditing is the documented Australian import procedures for horse importation that are developed by Biosecurity Australia (BA) and provided as advice to the Australian Quarantine and Inspection Service (AQIS). In overseas situations, it must be recognised that the respective competent authority of each exporting country applies its own sovereign system of implementation to meet Australian requirements. These implementation systems differ from country to country. Published operational procedures issued by these competent authorities, as well as operational manuals or guidelines available at pre-export quarantine premises, are also important documents that are sought for inspection.

Audits and inspections consist of examination of available documentation and observational inspections of facilities and their operation. In addition, face-to-face interviews with pre-export quarantine facility operators, attending veterinarians (when available) and relevant veterinary representatives of the national competent authority are undertaken.

To date, the focus of the audit and inspection process has been on those areas or elements of the import system for horses that potentially relate to highest levels of risk of failure of biosecurity. Identification of these areas has been guided by the findings of the Equine Influenza Inquiry, discussions with importing industry representatives, BA and AQIS officials as well as my own assessments based on previous involvement with import quarantine and biosecurity in Australia.

Initial priority was given to the facilities and operations in post-arrival quarantine (PAQ) stations in Australia and the arrival and clearance of horse imports at Sydney and Melbourne international airports. Overseas audits have initially been focussed on pre-export quarantine (PEQ) facilities (and operations therein) that have been identified as likely to be used in preparation of horses for export to Australia in 2009-2010.

Overseas inspections of PEQ facilities chosen for audit inspections have involved the following countries or administrative areas.

- England (three facilities)
- Ireland (four facilities)
- Germany (one facility)
- Hong Kong (two facilities)
- Macau (one facility)
- United Arab Emirates-Dubai (one facility), and
- USA (seven facilities).

A list of facilities and operations that have been subject to audit and inspection on given dates is provided at Attachment 2.

1.3 Alignment with other related initiatives

I remain mindful of other activities being undertaken in the many initiatives of the Australian Government to enhance the standard of quarantine and biosecurity for the

importation of horses. In particular, I have sought to coordinate to appropriate degrees with other initiatives that relate to the independent audit and inspection functions of the Interim Inspector General.

This includes the work of the Expert Group on Horse Importation established to provide advice on quarantine facilities within Australia. The Expert Group has inspected and reported on the adequacy of facilities used for the unloading and transfer of horses at Sydney and Melbourne airports and PAQ facilities used for the importation of horses.

Additionally, BA has recently undertaken an inspection and review of overseas PEQ procedures and the transport of horses from the PEQ facility to the point of export to Australia. This review will be particularly relevant to my ongoing audit and inspection functions that include overseas PEQ facilities and procedures.

BA and AQIS continue to conduct their respective roles including the assessment and inspection of horse quarantine facilities. In overseas countries, I took care in explaining the role of the Interim Inspector General and distinguishing it from the current roles of BA and of AQIS.

The Import Risk Analysis for horses, which is being undertaken by BA, will be crucial in determining future improvements to import procedures and the range of countries from which future horse importations will occur. Certain recommendations in my report will have relevance to this process.

2 Key Findings and Recommendations

2.1 Post-Arrival Quarantine (PAQ) Arrangements

2.1.1 Airport Clearance of Horse Import Shipments

The audits/investigations that were conducted on operational procedures at Sydney and Melbourne Airports found a high level of compliance existed with documented AQIS procedures by all relevant parties.

AQIS procedures were adequately documented. AQIS officers at both airports operated in trained and experienced teams. Briefing of the AQIS team members before the arrival of the aircraft was efficient.

Compliance with the protective clothing requirements for airport ground staff was found to be satisfactory. Compliance with the shower-out procedures by all parties who had close contact with arriving horses was also satisfactory.

2.1.2 Transport of Imported Horses to the PAQ Facility

The audits/inspections of the ground transport arrangements found satisfactory levels of compliance with the documented procedures. Important elements of this process are the sealing of horse transport vehicles after loading at Sydney and Melbourne airports, accompaniment of the transport vehicle by a marked AQIS car to the PAQ facility, and the cleaning and disinfection process applied to each horse transport vehicle after unloading at that facility.

2.1.3 Post Arrival Quarantine Facilities

Audits/inspections were conducted at the Eastern Creek Quarantine Station, the Spotswood Animal Quarantine Station and the Sandown (Woodlands) Quarantine facility operated by Victoria Racing Limited.

In most respects there was a satisfactory level of compliance with documented operational procedures. At one of the PAQ facilities a medium-level defect in compliance was found. This involved the process for the entry and exit to the horse quarantine area by security officers. The issue was brought to the attention of the PAQ management and relevant AQIS officials. Measures to correct the defect were identified for immediate action.

A design flaw was identified in the layout of the shower-out facility at Eastern Creek Quarantine Station. Remedial action was recommended to mitigate the risk of cross-contamination of clothing worn in the horse quarantine area with outside clothing during the exit procedure for staff and authorised visiting personnel.

An alteration to the internal road system in Eastern Creek Quarantine Station was also recommended to reduce the need for station staff involved in dog and cat quarantine activities to pass through part of the horse quarantine area.

I understand that the Expert Group on Horse Importation has also identified these as issues to be addressed.

Recommendation 1

AQIS should re-design the shower-out facilities associated with the horse quarantine compound at Eastern Creek Quarantine Station to completely ensure that clothing and footwear worn in the horse compound is separated from clothing and footwear worn outside that area.

Recommendation 2

AQIS should consider structural and procedural changes to the access arrangements for staff to the dog and cat quarantine area at Eastern Creek Quarantine Station to remove the need for transit by way of road through the horse quarantine compound.

Manuals of operations for PAQ facilities have been developed by AQIS. These are well detailed and my inquiries and observations led me to conclude that training and awareness activities for staff have been diligently conducted.

I found that Australia's requirement for overseas PEQ facilities to develop documented operational procedures in accordance with HACCP principles was inconsistent with the operational procedures developed for domestic PAQ facilities. It appears that the methodical risk management basis of a HACCP approach was the justification for its use in PEQ operational procedures. There would seem to be a similarly strong case for operational procedures at PAQ facilities to be HACCP based.

The adoption of HACCP based procedures at PAQ facilities may assist AQIS in negotiations with PEQ facilities on the requirement to develop operational manuals using a HACCP approach.

Recommendation 3

AQIS should revise manuals of operational procedures for post-arrival quarantine facilities in Australia to ensure they are consistent with a HACCP approach.

2.2 Pre-Export Quarantine (PEQ) facilities and their operations in overseas countries

Since October 2008, I have audited/inspected nineteen PEQ quarantine facilities in seven countries or administrative regions (Hong Kong and Macau).

No critical defects in compliance with AQIS import requirements were detected. In general, the import facilities and the implementation of their operations were satisfactory for most elements of the Australian requirements.

Several areas were identified where minor compliance defects were found or where improvements to facilities and operational procedures are needed. These have been detailed in my audit/inspection reports for individual PEQ facilities. Key findings and recommendations from those individual reports are summarised in this report. The outcomes of each audit/inspection conducted at individual PEQ facilities have been discussed with AQIS and BA. Copies of the individual facility reports will be provided to AQIS and BA.

In each country I found that the supervision and monitoring by the competent authorities of the aspects of PEQ facilities inspected to date meet Australian requirements.

However, I observed that the systems used to implement and supervise PEQ arrangements by competent authorities vary in significant ways across those countries in which audits/inspections have been undertaken. This is unsurprising in view of the sovereign arrangements that apply in each country.

2.2.1 Generic Findings and Recommendations at a Country Level

(a) Temporary Suspension of Certain Arrangements to Import Horses from the United Arab Emirates

Currently there are three types of AQIS quarantine procedures in operation for the importation of horses from the United Arab Emirates. Each is specific for one of the following:

- Return of Australian Horses
- Temporary Importation of Horses to Australia
- Permanent Importation of Horses to Australia

The first two of these import procedures allow for PEQ horses to use training facilities outside the PEQ facility under strict arrangements that maintain their quarantine separation from non-PEQ horses.

Large-scale redesign and reconstruction of the racetrack facilities used by PEQ horses has been scheduled to take place during the remainder of 2009.

This will significantly alter the availability of track facilities for PEQ horses in training. At the time of this report, the PEQ operator had withdrawn the offer of providing training facilities for horses in PEQ. This is a responsible action because the ability of officials to ensure exclusive time usage and required separation from non-PEQ horses cannot be guaranteed.

Without the ability to conduct ongoing training with suitable quarantine separation from non-PEQ horses, it is not possible to meet the AQIS import conditions required for the return of Australian horses or for the temporary importation of horses from the United Arab Emirates. However, it continues to be possible for horses to be imported under the AQIS import conditions for permanent importation to Australia.

It is understood that horses that performed in the Dubai World Cup would return to Australia under the conditions for permanent importation.

Recommendation 4

AQIS should temporarily suspend the import conditions for the return of Australian horses and the temporary importation of horses from the United Arab Emirates until the impending major re-construction of the racetrack, exercise track and horse walkways is at a stage when these facilities can be assessed for acceptability of separation from non-PEQ horses during exercise periods of PEQ horses.

(b) Adequacy of construction standards of a PEQ facility for cleaning and disinfection

The AQIS quarantine measures for horses require that stables “must be so constructed that they can be readily cleaned and disinfected”. The use of non-impervious flooring and, for similar consideration, the use of unsealed (non-lacquered) wood in stable walls makes the assessment of the ability for effective cleaning and disinfection very subjective.

Three PEQ facilities that I inspected in the United States had stables that did not have impervious flooring such as concrete. Their floorings ranged from sand to compacted earthen materials such as finely crushed rock.

All PEQ facilities I had inspected in other countries that export horses to Australia had flooring that I considered to be impervious for the purposes of ready cleaning and disinfection.

During my exit briefing with the United States Department of Agriculture (USDA) officials in Riverdale, Maryland, officials indicated that a requirement to replace the top 2-4cm of the non-impervious flooring immediately prior to an induction of PEQ horses for Australia would be implemented pending further advice from AQIS.

Recommendation 5

Biosecurity Australia should conduct a study that will enable objective standards to be defined for the internal surfaces (including flooring) of stables in PEQ facilities for cleaning and disinfection purposes.

(c) Nasopharyngeal swabbing in testing for equine influenza

I am advised that BA has specified that when acquiring samples to test for equine influenza nasopharyngeal swabbing should be used rather than nasal swabbing. This is aimed at maximising the amount of virus/virus product contained in samples. The requirement has been incorporated into the AQIS import measures for sampling horses to test for equine influenza.

During interviews with two accredited veterinarians in the United States it was found that they were using short length swabs to collect samples from the nasal passage of horses for the purpose of equine influenza testing. However, long length swabs are needed to access the nasopharyngeal region to obtain samples as per the AQIS requirements.

By contrast, one other accredited veterinarian interviewed described his technique and I was satisfied that he was sampling the nasopharyngeal area. Due to their unavailability during my visit to the United States, I did not interview three remaining accredited veterinarians who are involved with other PEQ facilities.

During my exit briefing with USDA officials in Riverdale, Maryland, it was indicated that the USDA will liaise with AQIS regarding issuing of an advisory notification to accredited veterinarians of the PEQ facilities approved for Australia about the need to ensure that the technique of nasopharyngeal swabbing is used.

Recommendation 6

AQIS should confirm with all competent authorities who are involved in the preparation for the export of horses to Australia the need for adherence by veterinarians to nasopharyngeal swabbing rather than nasal swabbing in testing undertaken during PEQ.

(d) Indoor exercise Areas in PEQ facilities

The Australian requirements state that stables must be able to be readily cleaned and disinfected. Three PEQ facilities in two overseas countries used stand-alone roofed enclosures to exercise horses. The flooring used in these enclosures was a soft particulate material; in two PEQ facilities it was wood shavings and in one it was shredded rubber. In the facilities using wood shavings, I observed that the material was moist and non-wood organic matter was present – possibly including horse urine and manure particles. It was indicated that the replacement of the flooring material had been on an occasional basis only.

I believe that these roofed enclosures should have equivalent hygiene standards to those required of stables. A distinction can be drawn between these roofed horse areas and the use of outdoor exercise fields. In the latter case, provided a horse-free period is used, manure is removed and the fields mechanically harrowed before the PEQ period. There are also extra contamination control factors at work in these outdoor situations, namely ultra-violet radiation from sunlight and exposure to wider variations in temperature and humidity.

In addressing this issue the competent authority proposed that the wood shavings used for floor cover would be replaced with new wood shaving just prior to the start of the PEQ period. In the case of the facility that used shredded rubber for flooring, the PEQ operator stated that the use of the roofed enclosure was not highly relevant for PEQ horses because suitable alternative exercise arrangements at the PEQ facility are available.

Although not applicable in these particular circumstances, if such an exercise facility had not been used by any equines for a long period of time prior to the PEQ period, there may be a case for acceptance that potential contamination has been effectively rendered non-existent.

Recommendation 7

AQIS should require that any indoor exercise area at a PEQ facility may only be used by horses undergoing PEQ for Australia after inspection by the competent authority has verified that either:

- a. Absorbent flooring previously used for the exercising of other horses has been replaced; or
- b. The time since the exercise area was last used by another horse has exceeded minimum requirements to be specified by AQIS.

(e) Use of Official Seals on Ground Transport Vehicles

In the course of PEQ inspections, I found that there is significant variation in the use of seals by competent authorities on the loading doors of ground vehicles that transport horses from PEQ premises to the airport of export to Australia.

In its import permit for horses, AQIS does not include a requirement for sealing of loading doors of ground transport vehicles before the vehicle departs from the PEQ facility.

The application of truck loading door seals by the official veterinarian at the PEQ helps provide assurances that PEQ horses were not off-loaded en route to the airport or that non-PEQ horses were loaded during the journey.

Such seals are used routinely by AQIS for ground transport of imported horses from the airport of arrival in Australia to the relevant PAQ station.

In some situations overseas, horses are transported for up to five hours between the PEQ facility and the airport of export.

I note that the recent report by BA on PEQ facilities and procedures also addresses this issue.

Recommendation 8

AQIS should introduce a standard requirement that loading doors of ground transport vehicles carrying horses from the PEQ to the point of export must be sealed to the satisfaction of the relevant competent authority after loading at the PEQ.

(f) Certification of health status of premises of origin of horses in PEQ

Certain elements in the export health certification of horses undergoing PEQ require detailed knowledge of the health status of the premises on which those horses have resided in the 60 days before export. Other elements require detailed knowledge of vaccination status of the horses relating to certain diseases during the preceding 12 months.

I have found that the processes in which the details are obtained, and hence the certification is provided, are variable in the apparent rigour shown and in the documentation of procedures and records.

This certification is readily available and verifiable in cases where the PEQ facility is used only for horses owned by a party linked to that facility. In these cases the residency and health records of the horses are on hand at that locality. It is only in the case of a PEQ that aggregates horses from several countries or states for a given consignment that gathering this information becomes more difficult.

The wording of the AQIS permit requirement for certifying the health status of the premises of origin commences with the phrase “So far as can be determined...”. This appears to acknowledge the reality that such information may have to rely to some extent on second or third hand information.

In one exporting country a major export agent proposed to improve and document the information gathering system used. AQIS should ensure that any improvements to the system are extended to other relevant PEQ situations in that and other countries.

Recommendation 9

AQIS should require that operational manuals of PEQ facilities must include a procedure for the sourcing and validation of information regarding the health status of the premises of origin and the vaccination history of horses in PEQ.

(g) Documented Operational Procedures in accordance with HACCP

The documentation of operating procedures by PEQ facility operators is at variable levels of completion and standards both within and between the horse exporting countries inspected to date.

AQIS has been using an approval system for PEQ facilities that has recognised the genuine need for the PEQ facilities to have time to develop documented manuals of procedures. This system has given interim approval status to many PEQ facilities that have been found by inspection to meet all other requirements for PEQ facilities and operations.

At the time of my audits/inspections, this interim approval system was in place. Hence, my findings that manuals of operations have not been completed nor use a HACCP approach have not been deemed to be compliance defects.

However, I am concerned at the paucity of documented procedures that exist at a few PEQ facilities. I am also concerned at the apparent lack of intent to use a HACCP based approach to develop manuals of procedures in some others.

I found that only four (of 19) PEQ facilities is using a HACCP approach to develop the manual of procedures. Several other facilities have extensively documented their procedures but this has not been done using a HACCP approach.

I am advised by AQIS officials that they are preparing a set of model operational procedures that is in line with the HACCP approach. I believe that this is a necessary step to ensure that PEQ facilities properly develop documented operational procedures that will enable their operations to be more effectively audited

Recommendation 10

AQIS should finalise as quickly as possible model operational procedures for PEQ facilities to assist competent authorities and PEQ facility operators to move more speedily toward development of HACCP-based manuals of operational procedures.

2.2.2 Specific PEQ Findings & Recommendations at a Facility Level

Several specific elements of the PEQ facilities and their operations were identified at audit inspection for modification so that Australian import requirements for horses can be met more appropriately. These include several minor issues that if addressed will improve biosecurity in the importation process for horses to Australia.

Of these, ones I consider to be highest in terms of relative importance are summarised below.

(a) Chain of custody of samples collected for testing from a PEQ facility

At one PEQ facility, the blood and swab samples taken from the horses in PEQ by the private veterinarian were left in the care of the PEQ facility operator who then drives the samples directly to the testing laboratory - a considerable distance from the PEQ facility.

I found no evidence to suggest that the PEQ facility operator did anything other than assist in effecting rapid transfer of the samples to maximise the testing time available for the laboratory staff.

However, there is a potential for a significant conflict of interest to operate in such circumstances. This could manifest in the substitution of samples or in the interference with samples in an attempt to optimise testing outcomes.

Recommendation 11

AQIS should confirm with the relevant competent authority that it is not acceptable for the chain of custody of samples taken for export testing from horses in PEQ for Australia to directly include the manager or operational staff of the PEQ facility.

(b) Proposed use of an outdoor sand-floor exercise area that is also used by non-PEQ horses

There was a proposal put to me by a PEQ facility operator that horses undergoing PEQ for Australia should be permitted to use a newly-built outdoor exercise facility that would also be used at a separate time of day by other horses undergoing post-arrival quarantine from several other countries. This sand covered exercise facility is more than 100m from the PEQ area for Australian horses and it is also more than 100m from the nearest other non-PEQ horses.

The (150m x 50m) exercise facility caters for lunging of horses, riding to trot level or for turn out of the horse.

I believe that horses using such a facility would be under less direct control than horses that are permitted to be ridden for racetrack work under appropriate biosecurity arrangements while undergoing PEQ. In an exercise yard situation, horses turned loose face a potentially higher exposure to cross-contamination from fence rails, gates and ground surface. That the proposal involved other horses that have not yet completed import quarantine and testing to verify their health status is an additional risk in this case.

Therefore, for biosecurity reasons, I do not believe it is feasible to permit the use by horses undergoing PEQ for Australia of common exercise areas that are used by other horses that are undergoing post-arrival quarantine even if such use is separated in time during the PEQ period

Recommendation 12

AQIS should confirm with the relevant competent authority that it is not acceptable for horses in PEQ for Australia to access the sand- floored exercise area that is used by other horses that are undergoing post-arrival quarantine in that country.

(c) Separation from non-PEQ horses during loading onto ground transport

One PEQ facility adequately maintained the required separation between PEQ horses and non-PEQ horses throughout the PEQ period. However, at the end of the PEQ period horses are walked to a loading ramp area to be loaded onto ground transport vehicles. In this walking transfer, the horses would come to within 50m of an enclosed horse barn that may contain local horses or overseas horses undergoing PAQ. The barn is enclosed by solid brick walls and non-opening windows and is air conditioned.

It is undesirable that horses could be present in that barn. However, I believe that the currently approved loading area can be continued to be used under adequate biosecurity with certain additional requirements.

Recommendation 13

AQIS should ensure that the Standard Operating Procedures under development for the relevant PEQ must specify that Australian PEQ horses to be walked to the ground transport loading ramp at the end of the quarantine period must not leave the PEQ facility until the following measures are undertaken:

- a. Any horses being accommodated at the barn adjacent to the loading area are stabled;
- b. External doors of that barn have been closed; and
- c. Only the loading ramps that are furthest from the barn will be used to load Australian PEQ horses.

(d) Separation of PEQ horses undergoing race-track training from safety attendants mounted on local horses

At one PEQ facility that is approved to use its facilities for race training of horses undergoing PEQ, there are local rules mandating that two horses and riders from the facility must be present at the track for safety-related reasons. These so-called “out-riders” serve a number of functions such as retrieving any loose horse that may have lost its rider.

I found that there are verbally-based procedures in place to ensure that these mounted safety attendants remain at least 100m away from Australian PEQ horses undergoing track work exercise. However, these need to be documented in the Standard Operating Procedures.

In the event that an on-track safety incident occurred with the horses undergoing PEQ for Australia and the mounted safety attendants intervened, this would breach the quarantine separation requirements that are specified in the AQIS import permit. The horses concerned would be disqualified from proceeding any further under that particular PEQ arrangement.

A detailed procedure for managing the immediate and longer-term consequences of such an incident has not been developed and documented in the PEQ facility’s manual of operational procedures. This is needed before any further horses undergo PEQ at that facility with the intention of including racetrack training in the quarantine arrangements. Importantly, this needs to provide sufficient assurances that the incident is fully reported by track personnel to the official veterinarian concerned and subsequently to AQIS.

Recommendation 14

AQIS should require that the Standard Operating Procedures under development for PEQ facilities that offer racetrack training include a documented procedure for horse-mounted safety officers at racetrack training sessions to maintain separation of at least 100m from Australian horses. In the event that such horses come into closer contact with Australian PEQ horse undertaking trackwork, this must be immediately reported to the official veterinarian and subsequently to AQIS, Canberra, as soon as possible with full details of that incident.

Interim Inspector General of Horse Importation
29 April 2009

Attachment 1

Charter for the Role of Interim Inspector General of Horse Importation

Mission and Scope

The office of the Interim Inspector General of Horse Importation (Interim Inspector General) has been established as a principal component of the Australian Government's implementation of the recommendations in the Commission of Inquiry into the outbreak of equine influenza in August 2007.

The mission of the Interim Inspector General is to ensure that the highest standards of biosecurity are being applied in the importation of horses to Australia through independent inspection and audit of import operations and procedures.

The scope of the role covers the importation processes beginning with the entry of horses to pre-export quarantine overseas, transportation to Australia and until completion of post-arrival quarantine requirements in Australia.

The Interim Inspector General's role does not involve importation policy or operational decision making.

Accountability

The Interim Inspector General reports to the Minister for Agriculture, Fisheries and Forestry.

The Interim Inspector General is accountable to the Secretary, Department of Agriculture, Fisheries and Forestry (the department) on matters of governance relating to the discharge of the role.

Independence

The Interim Inspector General is provided with office support through the Quarantine and Biosecurity Policy Unit of the department.

The Interim Inspector General is independent from the organisational and functional arrangements of the Australian Quarantine and Inspection Service and Biosecurity Australia.

Authority

The Interim Inspector General will work on a co-operative basis with competent authorities, companies and individuals involved in horse importation. It is expected that this co-operation will be facilitated through reasonable requests for the provision of information and facilitation of access to records and facilities.

The Interim Inspector General's work program is guided by the report of the Equine Influenza Inquiry and to the Australian Government's response to that Inquiry.

Responsibility

The primary role of the Interim Inspector General is to check, by inspection and audit that:

- operations and procedures at each approved pre-export quarantine premises are documented and being implemented effectively
- import conditions covering the period until the horses arrive at an airport in Australia are being met
- operations and procedures applying from when horses arrive at an airport in Australia until the end of the post-arrival quarantine process are documented and being implemented and complied with.

Audits are undertaken in the form of systems audits of import procedures and practices.

Reporting and Communications

The Interim Inspector General reports to the Minister of Agriculture, Fisheries and Forestry, including a report in writing at least once every twelve months.

The Interim Inspector General will consult with and provide advice to the Chief Executive of Biosecurity Australia, Executive Director of the Australian Quarantine and Inspection Service and the Officer Responsible for Horse Importation.

Standards of Practice

In conducting his responsibilities the Interim Inspector General will:

- apply professional, scientific and technical skills and experience in the conduct of the role
- act with honesty and integrity
- act with care and diligence
- while performing functions overseas, behave in a way that upholds the good reputation of Australia
- respect commercial confidentiality of information obtained in the course of its duties.

December 2008

Attachment 2

Facilities Inspected by Interim Inspector General of Horse Importation

A list of facilities and operations that have been subject to audit and inspection on given dates is provided below.

Each PEQ facility referred to below is a separate entity and has been inspected once only and on the specific date mentioned.

| Date | Facility or Procedures Subject to Audit Inspection |
|-------------------|--|
| 25 September 2008 | Eastern Creek Quarantine Station, Sydney |
| 02 October 2008 | Spotswood Animal Quarantine Station, Melbourne |
| 11 October 2008 | Melbourne Airport Horse Arrival Clearance |
| 21 October 2008 | Victoria Racing Limited PEQ facility (Woodlands), Sandown, Melbourne |
| 25 October 2008 | PEQ facility, Newmarket, UK |
| 27 October 2008 | PEQ facility, Newmarket, UK |
| 27 October 2008 | PEQ facility, Newmarket, UK |
| 31 October 2008 | PEQ facility, Macau |
| 01 November 2008 | PEQ facility, Sha Tin, New Territories, Hong Kong |
| 01 November 2008 | PEQ facility, Happy Valley, Hong Kong |
| 14 November 2008 | Spotswood Animal Quarantine Station, Melbourne |
| 29 November 2008 | Sydney Airport Horse Arrival Clearance |
| 08 December 2008 | Melbourne Airport Horse Arrival Clearance and Entry to Spotswood Animal Quarantine Station |
| 10 December 2008 | Eastern Creek Quarantine Station, Sydney |
| 02 February 2009 | PEQ facility, Co. Kildare, Ireland |
| 02 February 2009 | PEQ facility, Co. Kildare, Ireland |
| 03 February 2009 | PEQ facility, Co. Tipperary, Ireland |

| | |
|------------------|---|
| 03 February 2009 | PEQ facility, Co. Tipperary, Ireland |
| 06 February 2009 | PEQ facility, Lower Saxony, Germany |
| 09 February 2009 | PEQ facility, Dubai, United Arab Emirates |
| 16 March 2009 | PEQ facility, California, USA |
| 17 March 2009 | PEQ facility California, USA |
| 19 March 2009 | PEQ facility, Kentucky, USA |
| 19 March 2009 | PEQ facility, Kentucky, USA |
| 20 March 2009 | PEQ facility, Kentucky, USA |
| 20 March 2009 | PEQ facility, Kentucky, USA |
| 23 March 2009 | PEQ facility, New Jersey, USA |