



Australian Government
**Department of Agriculture,
Fisheries and Forestry**

INTERIM INSPECTOR GENERAL OF BIOSECURITY

**Quarantine surveillance following post-arrival quarantine
for specified horses after importation to Australia**

INTERIM INSPECTOR GENERAL OF BIOSECURITY

AUDIT REPORT

May 2010

No: 2009-10/03

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Note:

For the public release of this report personal information has been removed in accordance with the *Privacy Act 1998*.

Executive summary

This audit was undertaken as part of the Interim Inspector General of Biosecurity (IIGB) work plan for 2009-10. The audit work was undertaken by Dr Kevin Dunn, IIGB, during September, November and December 2009 to assess compliance by Biosecurity Services Group (BSG) (formerly Australian Quarantine and Inspection Service) regional offices with quarantine surveillance procedures for horses imported to Australia.

Compliance by quarantine officers with work instructions and technical operating manuals underpins the legal and administrative framework for managing quarantine risks associated with live horses imported to Australia.

On completion of post-arrival quarantine (PAQ), horses are either released or released to quarantine surveillance. Mares in foal must be released from PAQ under quarantine surveillance because one of the required pre-export tests, the test for *Taylorella equigenitalis*, cannot be conducted in-full while the mare is pregnant. Further, on a case-by-case basis, horses may also be released into quarantine surveillance if there are any potential biosecurity risks or if the horse has a quarantine condition that warrants monitoring over time. Horses under quarantine surveillance are released into an approved premise and remain under surveillance until completion of negative testing by a registered veterinarian after foaling or resolution of a specific quarantine condition.

The IIGB found that a high-level of compliance exists in the delivery of BSG's arrangements for quarantine surveillance for live horses, including *BSG Work Instruction – Quarantine surveillance for pregnant mares and foals (equidae)*. No specific or major control breakdowns in processes were found and deficiencies found and reported here are considered low risk. Recommendations outlined in this report support process improvements and a move towards best practice in quarantine surveillance within Australia.

Audit scope

This audit considered the quarantine surveillance arrangements for pregnant mares and foals. Procedural checks were undertaken during visits to BSG North East (NE) Regional Office in Brisbane, Central East (CE) Regional Office in Sydney and South East (SE) Regional Office in Melbourne to observe quarantine surveillance clearance processes.

This audit also considered the quarantine surveillance conditions for a single horse 'Horse A' that were formulated to address the specific biosecurity risks associated with equine protozoal myeloencephalitis (EPM). 'Horse A' was imported from the United States of America (USA) and is under quarantine surveillance in the BSG South West (SW) Region. A remote desk top audit was undertaken of paper records held by the SW Regional Office in Perth.

Quarantine surveillance processes examined included approval, recordkeeping, communication, monitoring, reporting and release.

Objectives

To observe regional office compliance with quarantine surveillance requirements for horses imported to Australia and, if necessary, make recommendations to address any identified control weaknesses.

Background

The rationale for establishing the quarantine surveillance conditions is outlined in the *BSG Work Instruction – Quarantine surveillance for pregnant mares and foals (equidae)* and is repeated here. Each year, hundreds of horses are imported into Australia. Horses from particular regions, e.g. the United Kingdom or the USA, are collectively imported to Australia in single consignments. Each consignment may pose a biosecurity risk from animal diseases such as equine influenza, surra and Japanese encephalitis.

Biosecurity Australia has provided recommendations to BSG regarding conditions for the import of horses to ensure that any potential biosecurity risks can be managed. The BSG import permit conditions for live non-New Zealand horses specify strict pre-entry quarantine (PEQ) and PAQ requirements for the horses, and all people and goods that come into contact with imported horses.

Horses are held in PAQ for periods as recommended by the Import Risk Analysis Report for Horses from Approved Countries. Prior to release from PAQ, the BSG veterinarian examines all health records and test results to assess whether the horse can be released from PAQ.

The majority of quarantine surveillance cases are for pregnant mares and foals. The conditions for this type of surveillance are outlined in *BSG Work Instruction – Quarantine surveillance for pregnant mares and foals (equidae)*. Mares in foal must be released from PAQ under quarantine surveillance because one of the required quarantine tests, the test for *Taylorella equigenitalis*, cannot be completed while the mare is pregnant. The import conditions allow for testing to be completed once the mare has foaled. The mare is placed under quarantine surveillance until this requirement is met.

Taylorella equigenitalis is a bacterium that causes contagious equine metritis (CEM) a venereal infection of the genital tract in horses. It is transmitted through sexual contact and mares may become carriers following the initial, acute illness. It is therefore important that mares under quarantine surveillance are prevented from having contact with other horses (in particular stallions) until they have tested negative for this bacteria. It is also important that testing is carried out when the mare is on heat and is not undergoing antibiotic or other treatment that may affect the test results.

During the quarantine surveillance period, the health of a horse is monitored by personnel at the approved premises, a private veterinarian and BSG. It is a requirement that BSG be notified if there are significant changes to the health of the animal during the quarantine surveillance period. Private veterinarians and premises personnel who attend the horse are responsible for ensuring that surveillance procedures are being followed, in particular that any health or containment issues are reported to the BSG veterinary officer supervising the surveillance. The BSG veterinary officer must ensure surveillance procedures are followed, until that horse is released from surveillance.

Quarantine surveillance is also required for horses that are 'temporarily imported for competition purposes'. Conditions for quarantine surveillance of these horses are outlined in the import conditions and may be different to those for pregnant mares.

Quarantine surveillance may also be required for other reasons and the conditions for these horses are assessed on a case-by-case basis, as in the sample case of the horse 'Horse A'. This horse was imported through Spotswood Quarantine Station in 2008 and found to have been affected by the disease EPM. BSG determined that it could be released to its owner but would remain in quarantine surveillance for life. Quarantine surveillance arrangements have been established for this horse to address the specific biosecurity risks associated with EPM. These arrangements were considered as part of this audit.

Fieldwork conducted

Location:	CE, Sydney	NE, Brisbane	SE, Melbourne	SW, Perth
Audit date:	17 November 2009 (document audit)	3 December 2009 (document audit)	18 November 2009 (document audit)	17 December 2009 (remote desk audit)
Audit team:	IIGB, Secretariat officer /DAFF	IIGB	IIGB, Secretariat officer /DAFF	IIGB
Report date:	30 November 2009	December 2009	30 November 2009	14 January 2010

Overview of findings

BSG staff interviewed and observed as part of this audit demonstrated adequate awareness and application of the procedures for quarantine surveillance procedures of pregnant mares and foals and the quarantine surveillance procedures established for EPM for the horse '*Horse A*'. However, this audit has identified opportunities to strengthen quarantine surveillance controls within the current operating environment.

Table of recommendations

Rec #	Recommendation
Approval process for premises used for quarantine surveillance of horses	
1	It is recommended that a follow-up audit of the quarantine surveillance procedures for imported horses be carried out in South East region during 2010 by the Interim Inspector General of Biosecurity or under other agreed arrangements. The audit should be conducted when the officer responsible for administration and oversight of the database and paper files in the region is available.
2	It is recommended that the Biosecurity Services Group (BSG) formally require the owner of the horse ' <i>Horse A</i> ' to specify the premises where the horse is to be kept and to advise BSG of any relocation of the horse during quarantine surveillance. [Refer to recommendation 9 for conditions to be met on the death of this horse.]
Quarantine surveillance - recordkeeping	
3	It is recommended that greater attention should be applied to the completion of records of equine quarantine surveillance information in the South East Regional office.
4	To assist in a nationally coordinated approach in quarantine surveillance recordkeeping, a standard format database should be developed for use by all regions to record all requirements of the relevant work instructions.
Quarantine surveillance – communication between regional officers	
5	To ensure a seamless transition into quarantine surveillance, the Biosecurity Services Group should ensure that any uniquely developed quarantine surveillance requirements are communicated to the appropriate regional office prior to the release of the horse from the post-arrival quarantine station.
Quarantine surveillance – Notification of Intent to Import (NOI)	
6	To remove a current practical anomaly it is recommended that the Biosecurity Services Group clarify the work instruction regarding responsibility for relevant notification to another region of an impending quarantine surveillance arrangement.

Table of recommendations (continued)

Quarantine surveillance – monitoring by regional officials	
7	It is recommended that the Biosecurity Services Group clarify the procedures for provision by the horse owner of a horse transport plan from the post-arrival quarantine facility to the approved premises for quarantine surveillance. In particular, this should specify the submission pathway for the importer to provide the transport plan.
8	It is recommended that the Biosecurity Services Group (BSG) tighten compliance in relation to the provision of a horse transport plan from the post-arrival quarantine facility to the BSG region in which quarantine surveillance is to occur.
9	It is recommended that where a horse is required to remain under quarantine surveillance for life, a detailed disposal plan for the horse's carcass be developed and agreed to between the Biosecurity Services Group, the attending private veterinarian and the owner. The disposal plan is to be kept at the appropriate regional office and should be maintained as a live document until the disposal conditions have been met.
10	It is recommended that the Biosecurity Services Group carry out inspections of the horse ' <i>Horse A</i> ' on a set schedule rather than the current ad hoc arrangements.

signed

Dr Kevin Dunn
Interim Inspector General of Biosecurity

Biosecurity Services Group formal response

Dr Kevin Dunn
Interim Inspector General of Biosecurity
GPO Box 858
CANBERRA ACT 2601

Dear Dr Dunn,

Thank you for your letter of 29 April 2010 regarding your draft audit report on *Quarantine Surveillance Following Post-arrival Quarantine for Specified Horses after Importation to Australia*, and subsequent meeting on 20 May 2010.

I appreciate the opportunity review the draft audit report and am pleased that you found a high level of compliance in the delivery of our arrangements for quarantine surveillance for live horses, including the work instruction - *Quarantine surveillance for pregnant mares and foals (equidae)*. I am also encouraged that the audit found only minor deficiencies that are considered low risk. Overall, Biosecurity Services Group (BSG) agrees with the recommendations in the draft report.

In fact the Horse Imports Program has already taken steps to address many of the audit findings and recommendations. The national work instruction on quarantine surveillance for pregnant mares and foals, is currently being updated to reflect your recommendations and is expected to be finalised by the end of June 2010.

As agreed with you, it is my preference that follow up audit work is carried out by BSG's Audit and Verification Unit and reported to you.

In your draft report you made observations that the current arrangements for quarantine surveillance contain inherent regulatory weaknesses. Now that the Import Risk Analysis for the importation of horses from approved countries has been completed, BSG intends to implement new arrangements that will result in premises holding pregnant mares and foals being registered as Quarantine Approved Premises (QAPs). This proposed approach allows stronger regulatory control as QAPs are explicitly legislated under the Quarantine Act 1908; facilities improved cost recovery mechanisms; and permits greater oversight as QAPs are regularly audited by the Co-regulation and Support Branch.

Finally, I am keen to develop a broader BSG Assurance Framework that, consistent with the Internal Audit findings, supports an audit and verification system that moves away from an over reliance of supervisory or individual verification, and more closely aligns with ISO 9000 systems audit practice. Assurance under the proposed system is provided through a structured process of checking the system to obtain independent evidence to verify the extent to which program business objectives are being met and risk are being managed. I will keep you informed of the progress of the development of this broader framework, through our regular meetings.

Attached to this letter is a summary of responses to the recommendation in the draft report.

I trust this information is of assistance. If you wish to discuss any of these matters in more detail, please contact Ms Lee Cale, General Manager (Acting), Animal Quarantine and Export Operations Branch on 902) 6275 5162 or lee.cale@daff.gov.au.

Yours sincerely

Signed

Rona Mellor

Deputy Secretary

21 May 2010

Specific findings

1. Approval process for premises used for quarantine surveillance of horses

BSG staff interviewed and observed at all regional offices demonstrated an understanding and application of the procedural framework surrounding the approval process for premises to be used for horses under quarantine surveillance.

Findings from NE, CE and SE regions audits:

An importer's Notice of Intent (NOI) provides identification of horses that are to remain subject to quarantine surveillance following release from PAQ. This principally involves pregnant mares. However, in SE region it involves some horses imported under Temporary Importation Permit conditions.

The NOI also identifies the intended quarantine surveillance premises. In accordance with the work instructions, in the NE, CE and SE regions, prior to quarantine surveillance commencing, premises require inspection and approval by a BSG veterinary officer. Approval remains current for 12 months provided no changes are made to the property that may affect its suitability for approval. In the case of SE region, an inspection is undertaken before each quarantine surveillance period.

Findings from SW region audit:

The audit of the SW Regional Office was specifically in relation to the quarantine surveillance conditions for one imported horse (a bay thoroughbred stallion 'Horse A'). The quarantine surveillance conditions were specifically formulated to address biosecurity risks associated with EPM, which BSG assessed as remote. Due to the level of risk involved, no specific approval requirements were applied to the premises on which the horse was being kept, hence no prior approval of the premises was undertaken. There is also no requirement for the owner to notify BSG of the premises where the horse is kept.

Recommendation 1:

It is recommended that a follow-up audit of the quarantine surveillance procedures for imported horses be carried out in South East region during 2010 by the Interim Inspector General of Biosecurity or under other agreed arrangements. The audit should be conducted when the officer responsible for administration and oversight of the database and paper files in the region is available.

Recommendation 2:

It is recommended that the Biosecurity Services Group (BSG) formally require the owner of the horse 'Horse A' to specify the premises where the horse is to be kept and to advise BSG of any relocation of the horse during quarantine surveillance. [Refer to recommendation 9 for conditions to be met on the death of this horse.]

2. Quarantine surveillance – procedures

Findings from NE, CE and SE regions audits:

The quarantine surveillance procedures are outlined in the BSG Work Instruction – Quarantine surveillance for pregnant mares and foals (equidae). BSG maintains and periodically updates this work instruction.

It was found that the work instruction is being followed satisfactorily by the NE, CE and SE regions. In the CE and SE regions it was noted that there have been recent modifications to the work instruction.

In CE region each horse undertaking quarantine surveillance is designated to the oversight of a nominated BSG veterinary officer.

In the case of horses temporarily imported for competition purposes, quarantine surveillance conditions are specific for each circumstance and are detailed on the import permit. No cases of horses being imported under these conditions were inspected under this audit.

Findings from SW region audit:

The quarantine surveillance procedures apply to the horse 'Horse A' only. The procedures only apply to the disposal of the horse's carcass if it dies in Australia or in the case of a change in ownership, by agreement between BSG and the new purchaser.

3. Quarantine surveillance – recordkeeping

Findings from NE, CE and SE regions audits:

The CE and SE regional offices administer the quarantine surveillance requirements for horses imported through Eastern Creek Quarantine Station (ECQS) and Spotswood respectively. The NE regional office administers the quarantine surveillance requirements for relevant horses moved to that region following release from PAQ at ECQS or Spotswood.

For horses scheduled to undergo quarantine surveillance in another BSG region, the originating regional staff require the receiving regional staff to provide assurance (by way of a completed Form 0.9 - Quarantine Surveillance Premises Approval) that the necessary arrangements are in place for the horse to enter quarantine surveillance in that region.

The NE, CE and SE regional offices maintain individual Microsoft Access databases to record details of quarantine surveillance. Individual paper files are also maintained on all horses released from quarantine into quarantine surveillance.

Both electronic and paper-based records audited at the NE and CE Regional Offices showed satisfactory levels of detail and currency.

At the time of the audit, the SE regional officer responsible for administration of the database and paper files was on duty elsewhere in the region. The SE regional office exhibited some discrepancies between paper and electronic records.

In the case of horses that move to another region to undergo quarantine surveillance, records are kept only up to the point of approved transfer to the new region. Responsibility for recordkeeping of completion of and release from quarantine surveillance for those horses is transferred to the receiving region.

The NE region receives horses for quarantine surveillance that have been imported via another BSG region. The NE regional office has also established a Microsoft Access database and paper file system to record details of horses that enter the region and undergo quarantine surveillance. However, some details are not available due to a lack of provision of information from the originating BSG region. Details found to be unavailable at the time of audit were the Form 0.2 - NOI and arrival date of a horse at the surveillance premises. The latter data should be consistent with the transport plan detail.

It is noteworthy that each of the three above BSG regions audited has undertaken the design and establishment of a records database under its own initiative. However, the lack of a standard format across all regions does not enable records to be consolidated nationally.

Findings from SW region audit:

In relation to the Spotswood audit, the IIGB was supplied with documentation relating to the quarantine surveillance arrangements for a specific horse, 'Horse A'. The horse was released from Spotswood in Melbourne into quarantine surveillance on 7 September 2008. Records show that the horse was released to a named person in Victoria and was destined to be transported at an unspecified time to a location in Western Australia.

Recommendation 3:

It is recommended that greater attention should be applied to the completion of records of equine quarantine surveillance information in the South East Regional office.

Recommendation 4:

To assist in a nationally coordinated approach in quarantine surveillance recordkeeping, a standard format database should be developed for use by all regions to record all requirements of the relevant work instructions.

4. Quarantine surveillance – communication between regional officers

Findings from NE, CE and SE regions audits:

In the case of horses that are transferred to another region to undertake quarantine surveillance, records audited show that adequate communication occurs and is recorded between officers in the originating and receiving regions.

Certain communication to other regions is required of the ECQS in the work instruction. It was noted that documentation of this communication is not routinely kept at the CE regional office but is maintained at ECQS. This was not examined during this audit.

The NE region receives horses from the CE region and it was found that communication between the NE region with CE and SE regions is undertaken via e-mail and fax media with hard copies kept in individual horse files. One horse named 'Horse B' was used as a sample case. The procedures used to establish quarantine surveillance by NE region for 'Horse B' were found to be managed satisfactorily as a result of effective communication processes between the two regional offices involved (that is, NE and CE).

Findings from SW region audit:

In the case study undertaken at Spotswood in relation to the horse 'Horse A', the quarantine surveillance arrangement was developed to meet the unique circumstances of the disease EPM. Records made available for audit show that the first documented information regarding the requirements for quarantine surveillance was provided by BSG to the SW regional office via e-mail on 23 February 2009. The email states the assessed biosecurity risks associated with the particular horse to be very remote although it was received five and a half months after the release of the horse into quarantine surveillance in the SW region.

Recommendation 5:

To ensure a seamless transition into quarantine surveillance, the Biosecurity Services Group should ensure that any uniquely developed quarantine surveillance requirements are communicated to the appropriate regional office prior to the release of the horse from the post-arrival quarantine station.

5. Quarantine surveillance – Notification of Intent to Import (NOI)

Findings from NE, CE and SE regions audits:

NOI lodgement by an importer of horses is a routine requirement before an import permit is issued. No significant instances of non-compliance with this requirement were seen or reported to the IIGB during the audits of the CE or SE regions.

The NE regional office is not provided with copies of the NOI to import. In this region, responsibility for this part of the process lies with the relevant PAQ station manager. This is assessed as a minor defect. In virtually all cases the NE region receives horses for quarantine surveillance from ECQS, CE region. In effect, the NE regional office receives alternative notification of individual horses destined for the region and other relevant details from the CE regional office during the PAQ period of the horse/s concerned.

Recommendation 6:

To remove a current practical anomaly it is recommended that the Biosecurity Services Group clarify the work instruction regarding responsibility for relevant notification to another region of an impending quarantine surveillance arrangement.

6. Quarantine surveillance – reporting of compliance

Compliance with quarantine surveillance relies heavily on the integrity of the horse owner and the private veterinarian engaged to undertake testing and inspection of reported health incidents.

BSG officials interviewed at NE, CE and SE regional offices reported that incidents of non-compliance were rare. No recorded compliance defects were found in the electronic or paper files audited.

During the audit of SE regional office, a BSG regional officer acknowledged that detection of a compliance breach (for example the movement of a horse to another location for activity or breeding) by an owner would be unlikely.

No compliance abnormalities were reported in the paperwork supplied by the SW region for this audit.

7. Quarantine surveillance – monitoring by regional officials including

- monitoring of transport plan
- contact owner and reporting of health changes in horse
- role of private veterinarian
- disposal plan on death of horse ['Horse A', SW Region]

Monitoring of transport plan

There is no systematic follow-up by CE and SE regions (i.e. the originating regions) that a horse released into quarantine surveillance in another region actually arrives at its intended destination. Responsibility for this is placed on the BSG officials in the receiving region.

From this audit it was noted that the NE Regional Office is not provided with a copy of the transport plan for each horse entering the region for quarantine surveillance.

It is noted that the work instruction is vague in respect to which BSG office should receive the transport plan from the importer. The quarantine surveillance system essentially relies on the owner of the approved premises to contact the BSG regional office to establish that the horse has entered the premises as expected. This usually occurs at the time the pregnancy test is undertaken by the nominated private veterinarian.

Contact owner and reporting of health changes in horse

The owner of the premises approved for quarantine surveillance is required to sign Form 0.8 - Conditions of Quarantine Surveillance for Imported Pregnant Mares and Foals (equidae), and also an agreement to abide by conditions as part of Form 0.9 - Quarantine Surveillance Premises Approval.

This audit showed that reporting of health incidents rarely occurs in the CE and SE regions. NE Region officials interviewed report that few health change reporting incidents have been encountered over recent years in horses undergoing quarantine surveillance. Examples cited were for colic, abortion and foal sickness. No health change reports were observed in the sampled documentation from current and recent quarantine surveillance.

Based on the very low numbers of health incident reports submitted over time, it is assumed that health incidents during quarantine surveillance are uncommon. There was no evidence found at audit to confirm this assumption or alternatively to show that health incidents do occur but are not reported.

Role of private veterinarian

The private veterinarian involved in inspection and testing of horses undergoing quarantine surveillance is nominated by the horse owner. The veterinarians are required to make an attestation of their knowledge of and commitment to comply with the conditions of quarantine surveillance by co-signing the conditions (Form 0.8 -Conditions of Quarantine Surveillance for Imported Pregnant Mares and Foals (equidae)) with the horse owner. There is no formal process for accreditation of private veterinarians for their role in the quarantine surveillance of imported horses. This would appear challenging in practical terms because of the relatively low frequency and geographically dispersed demands for horse quarantine surveillance. This results in a limited ability to independently assess the veterinarian's competence and knowledge of the quarantine surveillance requirements.

Monthly inspection visits are required by the veterinarian as a condition of quarantine surveillance. BSG regional officers have no way of knowing if the monthly inspections are carried out until the veterinarian provides an inspection report at the end of the quarantine surveillance period.

The biosecurity system relies heavily on the results of a culture test for the causative organism of CEM. In turn this relies on the competence of the private veterinarian to perform correct sampling procedures, use the correct culture medium and ensure that the sample arrives at the testing laboratory within 48 hours to ensure viability of any CEM bacteria, should they be present. The NE regional office makes contact to inform the private veterinarian of the requirements set down in the BSG work instructions. The BSG regional veterinary officer has very few mechanisms to check the competence of the private veterinarian's CEM testing procedures. For example, one mechanism used is the laboratory report form that usually captures the recorded sampling date and date of receipt of the sample at the laboratory. This permits a check of compliance with the BSG requirement that the sample must be transported to the laboratory within the 48 hour period after sampling.

Documents inspected at SE region showed that in one case, a mare '*Horse C*' had foaled and been subjected to the required post-foaling CEM test on 23 June 2009. Test results were reported to be negative by the testing laboratory (VIAS, Attwood) on 1 July 2009. As at 18 November 2009, neither the database nor the paper file had recorded completion of the process for quarantine surveillance. The paper file contained a note to the effect that a report from the private veterinarian is

awaited. This prolonged delay in formal closure of the quarantine surveillance on this animal highlights a defect in the system. Follow-up action by a BSG officer would appear to be needed when a private veterinarian's report is overdue (see above with respect to recommendation regarding the completion of records in the SE Regional Office).

8. Monitoring of quarantine surveillance in regions in relation to EPM including

- **contact with owner**
- **owner's reporting of health changes in horse**
- **role of private veterinarian**
- **disposal plan on death of horse**

An agreement specifying the BSG conditions of quarantine surveillance was signed by the owner of '*Horse A*' on 5 September 2008.

At audit, the SE regional office could find no documents relating to quarantine surveillance of this horse. The BSG officer interviewed during audit had no direct knowledge of the horse's history or quarantine surveillance requirements and presumed that these arrangements were coordinated by BSG Canberra. It is possible that some of these records may have been located at the Spotswood Quarantine Station and therefore were not available for this audit conducted at SE regional office.

Inspection of documentation provided by SW regional and BSG central offices shows records of BSG Canberra phone contact with the owner on 31 October 2008 records that the horse had no issues requiring veterinary attention.

BSG Canberra suggested that Spotswood contact the owner on an approximately monthly basis to check up on the horse and re-iterate the conditions of quarantine surveillance. Inspection visits were also suggested if a relevant official happened to be in the vicinity of the premises on which the horse was being kept.

The initial contact with the owner by Spotswood officials appears to have been in March 2009 (actual date unspecified in documents). Other recorded dates of contact are 30 November 2009 and 3 December 2009.

A regional BSG summary report of quarantine surveillance applying to this horse states that the owner was contacted three times by phone throughout 2009 after the initial March contact to follow-up on quarantine surveillance. The owner is recorded as reporting that the horse had no health issues at the time of each contact.

A plan by Spotswood officials to inspect the horse on 3 December 2009 was deferred, apparently at the request of the owner. Records up to 14 December 2009 do not show that this horse has been inspected by BSG officials since its release into quarantine surveillance on 7 September 2008.

A disposal plan for the horse's carcass does not appear to have been documented in any detail.

Recommendation 7:

It is recommended that the Biosecurity Services Group clarify the procedures for provision by the horse owner of a horse transport plan from the post-arrival quarantine facility to the approved premises for quarantine surveillance. In particular, this should specify the submission pathway for the importer to provide the transport plan.

Recommendation 8:

It is recommended that the Biosecurity Services Group (BSG) tighten compliance in relation to the provision of a horse transport plan from the post-arrival quarantine facility to the BSG region in which quarantine surveillance is to occur.

Recommendation 9:

It is recommended that where a horse is required to remain under quarantine surveillance for life, a detailed disposal plan for the horse's carcass be developed and agreed to between the Biosecurity Services Group, the attending private veterinarian and the owner. The disposal plan is to be kept at the appropriate regional office and should be maintained as a live document until the disposal conditions have been met.

Recommendation 10:

It is recommended that the Biosecurity Services Group carry out inspections of the horse 'Horse A' on a set schedule rather than the current ad hoc arrangements.

9. Quarantine surveillance – release process

Under normal circumstances, quarantine release is undertaken by the relevant BSG veterinary officer. The formal release takes place at the end of the quarantine surveillance period, after it is established that all required quarantine conditions have been met.

Release from quarantine surveillance at the NE, CE and SE regional offices inspected was appropriately documented.

The horse '*Horse A*' was found to have been affected by EPM therefore will not be released from quarantine surveillance. The quarantine surveillance will cease after the horse's death and disposal of its carcass under conditions set out by BSG.

10. General observations

The regulatory management of quarantine surveillance is a challenge due to the:

- often lengthy nature of quarantine surveillance periods
- sporadic nature of the trade
- geographically dispersed premises in which quarantine occurs.

For the most part, compliance relies on the integrity of owners and the nominated private veterinarians.

Audits of CE and SE regional offices found no major compliance defects. However, reliance on third parties to comply with requirements extending over several months highlights an inherent regulatory weakness. For example, the case of the mare '*Horse C*' outlined at 7 above. Formal release of '*Horse C*' from quarantine surveillance should have occurred in early July 2009 but, according to the files audited, had not occurred by November 2009 because of the absence of a report by the private veterinarian.