



Australian Government
Department of Agriculture,
Fisheries and Forestry

INTERIM INSPECTOR GENERAL OF BIOSECURITY

Import Health Certification for Horses Imported to Australia

INTERIM INSPECTOR GENERAL OF BIOSECURITY
AUDIT REPORT
November 2009

No: 2009-10/02

Table of contents

| | |
|-------------------------------|---|
| Executive summary..... | 3 |
| Table of recommendations..... | 4 |
| Audit findings | 5 |

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) assurance work program for 2009-10. The audit work was carried out by Dr Kevin Dunn, IIGB, in November 2009.

The objective of this audit was to assess and check compliance of import health certification with the requirements for importing horses to Australia. It focused on certification for a number of consignments of stallions.

To import horses to Australia, the Australian Quarantine and Inspection Service (AQIS) requires certification from the relevant exporting country authority that provides sufficient evidence of veterinary certification and compliance with the AQIS import conditions up to the time the horse arrives at the airport of departure. This includes dates and results of all required tests and treatments, dates of all required vaccinations and details of any additional treatments the horse has received in pre-export quarantine (PEQ) or is currently receiving.

On completion of the audit, the IIGB provided three recommendations to improve health certification for horses imported into Australia.

The IIGB recommended the Biosecurity Services Group¹ (BSG) require a full import health certification for any test mares maintained in the PEQ facility during the quarantine period and not intended to be exported. This will assist in confirming the integrity of the PEQ conditions for the exported consignment of horses.

In ensuring the credibility of certification documentation the IIGB recommended that BSG should note and consider the appropriateness of a veterinarian issuing certain components of the health certification without evidence of official status of being a Licensed Veterinary Inspector.

The audit revealed a misalignment of the United States Department of Agriculture (USDA) Veterinary Health Certificate with the AQIS Import permit. This makes assessments difficult for the AQIS veterinary officers at the port of arrival in Australia as well as for audit processes. The IIGB does not regard this as materially significant and recommended that BSG should clarify with the USDA the requirement for documentation be supplied that addresses any specific conditions and to be attached to the health certifications for all future shipments of horses from the United States.

Setting and implementing the requirements for importing horses to Australia is the responsibility of BSG. A summary of the IIGB's recommendations and BSG's responses are provided below. In its response, BSG agreed with the recommendations and advised all were currently being addressed.

¹ Note that AQIS is now part of the Biosecurity Services Group in the Department of Agriculture, Fisheries and Forestry. The terms AQIS and Biosecurity Services Group (or BSG) are both used in this document and should be read as referring to the same entity.

Table of recommendations

| Rec # | Recommendation | BSG management response |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | In the case of stallion imports, the Biosecurity Services Group should require full import health certification for any test mares maintained in the pre-export quarantine facility during the quarantine period and not intended to be exported. | Agree |
| 2 | The Biosecurity Services Group should note and consider the appropriateness of a Licensed Veterinary Inspector issuing certain components of the health certification relating to import conditions as a private veterinary practitioner with no reference to his/her official Department of Environment Food and Rural Affairs status. | Agree - This is part of the competent authority assessment and was carried out as part of the IRA. |
| 3 | Biosecurity Services Group (BSG) should clarify with the United States Department of Agriculture (USDA) the requirement for documentation to be supplied that addresses Condition 13.1 in the USDA Veterinary Health Certificate. It is advisable that this documentation accompany the health certification provided with all future shipments of horses from the United States of America (USA). | Agree - Note that there is some sensitivity in discussions with the USA regarding compliance with Australian import conditions. |



Dr Kevin Dunn
Interim Inspector General of Biosecurity

Audit findings

Arrival Airport: Melbourne
Date: 17 July 2009
AQIS Import Permit: IPXXXXXX (Subdivided into IPXXXXXX for 4 horses and IPXXXXXX for 10 horses)
Number of Horses: 14
Importer: Xxx, Melbourne
Exporting Country: USA
PEQ Facilities: Ashford Stud, Versailles, Kentucky
Vinery, Lexington, Kentucky
Taylor Made Stallions, Nicholasville, Kentucky
Considine Farm, Lexington, Kentucky

Summary of recommendations

1. Biosecurity Services Group (BSG) should clarify with the United States Department of Agriculture (USDA) the requirement for documentation to be supplied that addresses Condition 13.1 in the USDA Veterinary Health Certificate. It is advisable that this documentation accompany the health certification provided with all future shipments of horses from the United States of America.
2. In the case of stallion imports, BSG should require full import health certification for any test mares maintained in the pre-export quarantine facility during the quarantine period and not intended to be exported.

| Documentation Element | Findings | Recommendations |
|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pre-entry preparation to pre-export quarantine (PEQ) facility | AQIS issued a Certificate of Equivalence (2009/XXX) regarding the equine influenza vaccination for one horse (Xxxr Xxx). It was not clear why the certificate was issued. No reflection of this was sighted in the health certificate. | |
| Pre-export quarantine | <p>AQIS issued a Certificate of Equivalence (2009/XXX) regarding the showering requirement for personnel entering the PEQ and for the requirement for transferring a blood sample to the Australian Animal Health Laboratory.</p> <p>The numbering of individual health conditions in the AQIS Import Permit does not align with the way conditions are numbered in the U.S. Department of Agriculture (USDA) Veterinary Health Certificate. This makes difficult the assessment by AQIS veterinary officers at the port of arrival in Australia. It also makes difficult the audit process. However, this is not regarded as materially significant.</p> <p>In Clause 13.1 in the USDA Veterinary Health Certificate it is stated that the Official Veterinarian must provide certification in the form of a checklist that health certificates and health records including measurement of rectal temperatures have been inspected. An attestation to this effect for 11 of the horses was attached from Accredited Veterinarian X Xxxx. In the documents available for audit no such attestation or checklist was sighted from the Accredited Veterinarian X Xxxx.</p> <p>Copies of test results available with the health certificates indicate</p> | <p>Recommendation:</p> <p>BSG should clarify with the USDA the requirement for documentation to be supplied that addresses Condition 13.1 in the USDA Veterinary Health Certificate. It is advisable that this documentation accompany the health certification provided with all future shipments of horses from the United States of America.</p> <p>Recommendation:</p> <p>In the case of stallion imports, BSG should require full import health certification for any test mares maintained in the PEQ during the quarantine period and not intended to be exported.</p> |

| Documentation Element | Findings | Recommendations |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| | <p>that three female horses were present in the PEQ centres associated with the stallions for export. It is presumed by the auditor that these are “test” or “jump” mares and that they were not intended for export.</p> <p>However, no mention of these is made in the attestations by X Xxxx regarding the inspection of health records including temperature checks. No mention of any female horses is made in the certification from X Xxxx - although the test results relating to the PEQ that he supervised include a female horse.</p> <p>In view of the apparent absence of a checklist or other form of attestation from X Xxxx of inspection of health records and temperature charts, this is a significant omission in the health certification for this shipment.</p> | |
| Certifying veterinarian | <p>X Xxxx was the Accredited Veterinarian certifying 11 horses.</p> <p>X Xxxx was the Accredited Veterinarian certifying 3 horses.</p> <p>USDA Endorsing official veterinarian was X Xxxx.</p> <p>USDA Port Veterinarian (at Louisville Airport, Kentucky) was X Xxxx.</p> | |
| Ground transport and airport measures in export country | <p>The certificate for disinfection of aircraft stalls was issued by X Xxxx on 14 July 2009. The certificate for disinfection of the aircraft was issued by X Xxxx on 15 July 2009.</p> | |

| Documentation Element | Findings | Recommendations |
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| | <p>The design of the USDA export health certificate is unhelpful in certain aspects. The conditions for ground transport including no contact between the export shipment and other horses and disinfection of the aircraft and fittings are included above the signature of the Accredited Veterinarian and the Endorsing USDA Veterinarian. In this case of the horses from four PEQs, it would appear that none of these veterinarians attended the airport procedures. However, the certificate can be read that they have certified these measures 2-3 days before they occurred. This is clearly an artefact of the layout of the USDA certificate. There is a signature block for the USDA Port veterinarian on a final and separate page to the health certificate. However the only details on that page are the identification description and silhouette of the horse.</p> | |
| General | <p>With the exception of the above shortcomings, the remaining certification is suitably presented and complete.</p> | |

Audit date: 18 November 2009
Auditor: Dr Kevin Dunn, Interim Inspector General of Biosecurity
X Xxxx, Department of Agriculture, Fisheries and Forestry (observer)
Report date: 30 November 2009

Arrival Airport: Sydney
Date: 4 August 2009
AQIS Import Permit: IPXXXXXX
Number of Horses: 7
Importer: Xxx, Melbourne
Exporting Country: USA
PEQ Facility: Darley (James Lane), Lexington, Kentucky

Summary of recommendations

1. In the case of stallion imports, the Biosecurity Services Group should require full import health certification for any test mares maintained in the pre-export quarantine facility during the quarantine period and not intended to be exported.

| Documentation Element | Findings | Recommendations |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Pre-entry preparation to PEQ facility | <p>In the case of 5/7 of these horses, their vaccinations for equine viral arteritis (EVA) did not fit the required timeframes. AQIS was alerted to this by the importing agents and accepted certification of equivalence after technical assessment of each horse's circumstances. Documentation covering this is complete and filed with the certificates.</p> <p>This issue was duly detected and recorded on Import Clearance coversheet by the AQIS veterinarian undertaking clearance of the horses on arrival in Sydney.</p> | |
| Pre-export quarantine | One test mare Xxxx (also called a "drop mare" or "jump mare") was present during PEQ to assist testing of the stallions for | Recommendation: |

| Documentation Element | Findings | Recommendations |
|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>contagious equine metritis (CEM). This animal did not proceed to export with the shipment. Laboratory test results provided with the health certificates for all horses in the shipment also include this mare. All tests are negative.</p> <p>No documentary evidence was seen at audit that this mare met the vaccination and daily temperature check requirements of the AQIS import permit.</p> | <p>In the case of stallion imports, the Biosecurity Service Group should require full import health certification for any test mares maintained in the PEQ during the quarantine period and not intended to be exported.</p> |
| <p>Certifying veterinarian</p> | <p>X Xxxxx (of Xxxx Xxxx Veterinary Medical Institute, Xxxx) was the Accredited Veterinarian.</p> <p>US Department of Agriculture (USDA) Endorsing Veterinarian was X Xxxx.</p> <p>USDA certifying veterinarian at the airport of export (Cincinnati) was X Xxxx.</p> | |
| <p>Ground transport and airport measures in export country</p> | <p>X Xxxx signed the aircraft disinfection and air stalls disinfection certificates on 2 August 2009, note these certificates appear supplementary to what is required on the USDA export health certificate (see below).</p> <p>The design of the USDA export health certificate is unhelpful in certain aspects. The conditions for ground transport including no contact between the export shipment and other horses and disinfection of the aircraft and fittings are included above the signature of the Accredited Veterinarian and the Endorsing USDA</p> | |

| Documentation Element | Findings | Recommendations |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| | <p>Veterinarian. In this case, it would appear that neither attended the airport procedures. However, the certificate can be read that they have certified these measures 2-3 days before they occurred. This is clearly an artefact of the layout of the USDA certificate. There is a signature block for the USDA Port veterinarian on a final and separate page to the health certificate. However the only details on that page are the identification description and silhouette of the horse.</p> | |
| General | <p>With the exception of the above shortcomings, the remaining certification is suitably presented and complete.</p> | |

Audit date: 17 November 2009
Auditor: Dr Kevin Dunn, Interim Inspector General of Biosecurity
 Xxxxx, Department of Agriculture, Fisheries and Forestry (observer)
Report date: 30 November 2009

Arrival Airport: Sydney
Date of Importation: 4 August 2009
AQIS Import Permit: IPXXXXXX
Number of Horses: 8
Importer: Xxx, Melbourne
Exporting Country: United Kingdom
PEQ Facility: Darley (Someries Stud), Newmarket, UK

Summary of recommendations

1. BSG should note and consider the appropriateness of a Licensed Veterinary Inspector issuing certain components of the health certification relating to import conditions as a private veterinary practitioner with no reference to his/her official Department of Environment Food and Rural Affairs status.

| Documentation Element | Findings | Recommendations |
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| Pre-entry preparation to PEQ facility | All measures were found to have been satisfactorily met. | |
| Pre-export quarantine | One horse (Xxxx) undertook PEQ but was not included in the import shipment for commercial reasons. A letter attesting to this horse's having fully met PEQ requirements was provided by X Xxxxx who is also the Licensed Veterinary Inspector (LVI) for the PEQ. However, this letter and an attestation by the same veterinarian relating to the treatment of the horses with insect repellent (a condition on the AQIS permit) is signed on private company letterhead and carries no official Department of Environment Food and Rural Affairs (DEFRA) stamp of official signature title. | <p>Recommendation:</p> <p>BSG should note and consider the appropriateness of a LVI issuing certain components of the health certification relating to import conditions as a private veterinary practitioner with no reference to his/her official DEFRA status.</p> |

| Documentation Element | Findings | Recommendations |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| | <p>A derogation issued by AQIS relating to certain conditions on the import permit for this shipment was seen to have been appropriately applied.</p> <p>All other measures were found to have been satisfactorily met.</p> | |
| Certifying veterinarian | X Xxxx certified the PEQ and airport measures for export. | |
| Ground transport and airport measures in export country | Conditions of the import permit relating to local ground transport and aircraft disinfection were found to be in order. These measures were certified by the LVI concerned also with the PEQ (X Xxxxx). | |
| General | The certification was well presented in a complete and legible manner. | |

Audit date: 17 November 2009
Auditor: Dr Kevin Dunn, Interim Inspector General of Biosecurity
Xxxxx, Department of Agriculture, Fisheries and Forestry (observer)
Report date: 30 November 2009

Arrival Airport: Sydney
Date: 5 August 2009
AQIS Import Permit: IPXXXXXX
Number of Horses: 9
Importer: Xxx, Melbourne
Exporting Country: Ireland
PEQ Facility: Coolmore (Fairy King Farm), Fethard, Tipperary

Summary of recommendations

1. In the case of stallion imports, the Biosecurity Services Group should require full import health certification for any test mares maintained in the pre-export quarantine facility during the quarantine period and not intended to be exported.

| Documentation Element | Findings | Recommendations |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pre-entry preparation to PEQ facility | AQIS derogation was issued granting equivalence with the vaccination requirements for equine viral arteritis and equine influenza. This was duly reflected in the health certificates. | |
| Pre-export quarantine | <p>AQIS derogation was issued regarding the time and location of showering before entry to the PEQ by personnel. This was duly reflected in the health certificates.</p> <p>Two test (also called “jump” or “drop”) mares were maintained in the PEQ for the duration of the quarantine. Copies of test results were provided for these mares in addition to the 9 stallions that comprised the export shipment. All test results were negative.</p> <p>Documentation to show that these mares had been subject to the</p> | <p>Recommendation:</p> <p>In the case of stallion imports, the Biosecurity Services Group should require full import health certification for any test mares maintained in the PEQ during the quarantine period and not intended to be exported.</p> |

| Documentation Element | Findings | Recommendations |
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| | <p>same other PEQ requirements (including daily temperature checking and pre-entry vaccination) was not sighted at this audit.</p> <p>In line with Irish Department of Agriculture, Fisheries and Food policy, the certifying veterinarian for the health certificates is the portal veterinary officer at the airport of export (in this case, Shannon Airport). Documentary evidence of the 9 horses in the export shipment having met all AQIS import conditions for the PEQ period was provided by the Accredited Veterinarian who supervised the PEQ.</p> | |
| Certifying veterinarian | <p>X Xxxxx was the accredited veterinarian authorised by the Irish Department of Agriculture, Fisheries and Food.</p> <p>X Xxxxx was the Irish official portal veterinarian who signed the health certificates.</p> | |
| Ground transport and airport measures in export country | These aspects were duly certified by X Xxxxx at Shannon Airport. | |
| General | The certification was presented and complete | |

Audit date: 17 November 2009
Auditor: Dr Kevin Dunn, Interim Inspector General of Biosecurity
Xxxxx, Department of Agriculture, Fisheries and Forestry (observer)
Report date: 30 November 2009