

**AUSTRALIA'S REVISED IMPORT RISK ANALYSIS AND MEASURES
ON PRAWNS AND PRAWN PRODUCTS**

Statement by Vietnam at the meeting of 27-28 June 2007

The following communication, received on 27 June 2007, is being circulated at the request of the Delegation of Vietnam.

1. The fishery industry, especially prawn culture, plays an important role in Vietnam's economy. Statistically, Vietnam has approximately 4 million labourers depending on the fishery industry, 50 per cent of whom are involved in the prawn production chain (manufacturing feed for prawn, prawn culture, processing and other related logistics services). A lot of farmers have escaped from poverty and their living standards have gradually been improved.
2. Vietnam's prawns and the products thereof, especially black tiger prawns (*Penaeus monodon*) are of high quality because Vietnam has a well-organized system of food safety control. Our system of aquatic animal disease control in general, and for prawns in particular, is also very good. In 2006, prawn products of Vietnam were exported to more than 90 countries and territories worldwide, especially to markets with high demands for food safety and disease control such as the United States, Japan and the European Communities.
3. Until now, Vietnam has not received any indications of the spread of disease from Vietnam's and Asia's prawns to importing countries, including Australia. Therefore, Vietnam is concerned about the strict quarantine measures in the draft IRA delivered by the Australian competent authority.
4. Upon receipt of the draft IRA, we conducted research, as well as collected opinions from experts and scientists, including international ones (from NACA and SEAFDEC). After that, we sent our comments to the Australian competent authority (official letter No. 412/CLTY-TY dated 13 February 2007).
5. At this meeting of the SPS Committee, we would like to reiterate our comment that the draft IRA consists of many evaluations which lack science-based evidence, including the following:
6. The disease situation of prawns is different from country-to-country, so the requirement of the IRA to apply the same risk analysis for all prawns imported from different countries is not appropriate. Out of the 5 diseases which the IRA stated need to be controlled (Taura syndrome virus (TSV), Infectious hypodermal and haematopoietic necrosis virus (IHHNV), Necrotising hepatopancreatis bacterium (NHPB), White spot syndrome virus (WSSV) and Yellowhead virus (YHV)), it is reported that TSV, IHHNV, NHPB diseases have not yet occurred in Vietnam. Yearly statistics on prawn disease monitoring shows that only Gill Associated Virus (GAVs) was recorded, not YHV. That is why Biosecurity Australia should carry out independent risk assessments, especially for prawns imported from each country (according to the OIE guidelines and in line with

the situation of each country), in order to set up the appropriate risk management measures for each exporting country.

7. The claim that "Australian strain of IHNV is likely related to Indian Ocean strain, considered to be less virulent to penaeids than the Philippines strain which is appearing in other countries" is not convincing and lacks sufficient scientific evidence.

8. For NHPB, the causative agent has not yet been identified, therefore, the application of intensified quarantine measures based on import risk for the disease is not feasible.

9. We should recognize that WSSV and YHV diseases have occurred for more than a decade in prawn-culture countries, including China, Thailand, Vietnam, Indonesia and the Philippines. Australia has imported brackish prawns from these countries for a long time and since 2001, Australia has applied strict quarantine measures (such as import prawn size must be larger than 15gr/piece, certificates issued by competent authority of exporting country certifying "non-early harvest" and non WSSV and YHV clinical signs). Biosecurity Australia has confirmed that WSSV and YHV have not occurred in Australia for the past six years. The above-mentioned facts prove that the current quarantine measures applied in Australia are efficient enough to prevent the entry and spread of these exotic diseases. On the other hand, the prevention of dangerous diseases such as WSSV, YHV and TSV in Southeast Asian countries has improved significantly, which leads to the fact that the risk of dangerous diseases being transmitted through imported prawns into Australia is now lower than before and the strict quarantine measures as proposed in the draft report are not necessary.

10. Prawns in Southeast Asia are raised mainly for export to Australia as food and this is clearly stated in the documents attached to the consignments or on the labels of products. The Australian Competent Authorities are responsible for post-arrival food inspection to prevent the misuse of these imported food prawns as bait or raw feed in hatcheries. Australia should tighten its post-arrival controls in order to minimize effectively the above abuse instead of intensifying application of strict control measures on imported consignments.

11. Australia intends to test 100% of imported prawn consignments for WSSV and YHV by OIE's updated method. This is not necessary because:

- (a) The Polymerase chain reaction (PCR) cannot distinguish infective dose from non-infective doses, nor can it distinguish active from non-activated viruses. For instance, cooking always inactivates these viruses, yet a cooked prawn can record a positive PCR test. Such a test is not able to make the distinction between live and dead viruses. Therefore, Australia does not allow the importation of consignments containing inactive viruses that are not able to transmit disease.
- (b) Sampling of imported prawns is not representative for all consignments, is inefficient as a tool for prevention of entry of exotic diseases and is expensive. The waiting time for test results also causes difficulties for exporters and importers.

12. We strongly support and agree with Thailand's and China's comments on the Draft IRA, as well as with the Singapore Industrial Automation Association (SIAA), Vietnam Fisheries Association (VINAFIS) and Vietnam Association of Seafood Exporters and Producers (VASEP). We would also like to emphasize some opinions from the above-mentioned comments as follows:

- (a) The risk management measures lack science-based evidence and statistics. For instance, all un-cooked products are supposed to have high disease risks. This view is not correct because products from headless prawns have much lower disease risks than those from whole prawns.

- (b) In the Biosecurity Policy Memorandum 2001/06 of Australia, it is stated that the post-arrival control measures need to be applied as a supporting tool for pre-arrival control measures to facilitate trade development, but the measures mentioned in the Draft IRA report run contrary to this statement.

Conclusion

13. Based on the above comments, we would like to propose that the Australian Government maintain the measures to control diseases of brackish prawns imported into Australia which have proven to be effective since 2001.

14. The risks analysis of Biosecurity Australia which lead to the extremely strict control measures mentioned in the draft IRA was not based on scientific evidence and the real situation of prawn exporting countries and Australia. We have the sense that this is a kind of trade barrier under the form of an SPS measure and obviously it does not conform to the WTO SPS Agreement.

15. We are concerned that the application of the quarantine measures identified in the draft IRA on imported prawns and prawn products will not only affect the rights of Australian consumers but also stakeholders involved in importing and distributing imported prawns in Australia, as well as millions of prawn farmers in Asia in general and hundreds of thousands of prawn farmers in Vietnam in particular.
