



# Review of rabies virus risk in imported dogs, cats and canine semen from approved countries

Draft report, October 2022

Submission of the  
Australian Veterinary Association Ltd

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## The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry, research and teaching. Veterinary students are also members of the Association.

## Review of rabies virus risk in imported dogs, cats and canine semen from approved countries - Draft report October 2022

The AVA acknowledges the thorough analysis that has gone into producing the draft *Review of rabies virus risk in imported dogs, cats and canine semen from approved countries* (the Report), which appears to draw reasonable conclusions.

The proposal to extend post export quarantine (PEQ) from 10 to 30 days for group 3 approved countries is the most controversial of the proposed changes. However we acknowledge that it is a precautionary measure based on the experience in other countries, that where breakdown in quarantine measures has occurred, most cases show clinical signs within 30 days. We also acknowledge that the impetus for the change is the growing evidence of increased risk posed by fraudulent certification and documentation arising from an increase in international commercial breeding and trade.

There are benefits but also disadvantages of extending PEQ. The benefit is clearly the reduced risk of rabies entry to Australia, and given its potential devastating impact on the animal and human population, this is a strong argument. The disadvantages of the extended PEQ include the animal welfare imposts on the individual animals that are detained (including anxiety and behavioural change due to prolonged confinement and separation from their owners) as well as owner distress and economic costs.

We note that since 2013, there have been no cases of rabies under the current 10 day PEQ system or following release in Australia. We also note that all documented cases of quarantine breakdown in other countries were associated with illegal movements, smuggling or commercial imports, not with pets accompanying their owners returning home.

It is possible that lengthening PEQ is not necessary for all dog and cat imports from group 3 approved countries, and that a compromise option could be considered: i.e., lengthening PEQ to 30 days for ONLY commercial imports by commercial breeders. The Report (pg 20) notes that the UK, EU and Canada 'recognise a different risk profile' and have 'different import conditions' for pets accompanying owners versus commercial consignments. Australia could potentially adopt this same approach.

We understand that Australian pet owners already face significant challenges when relocating pets to Australia, and that the PEQ facility in Melbourne has limited capacity and long waiting lists. This fact may strengthen the argument for adoption of the compromise option (above).

Our member veterinarians service Commonwealth employees including Diplomatic staff who are regularly posted overseas, many of whom take their companion animal family members with them. We have heard from a large number of them who are already overseas and are very concerned by the proposal, given they left with their pets expecting to return under the current 10-day PEQ rule.

Given that a significant reason for the increased quarantine period is the concern for fraudulent certification (of animal ID, vaccination status, serological evidence of vaccination, etc), could a grace period or



“grandfathering” be appropriate for those Diplomatic staff so affected? Australia must invest substantial trust in its Diplomatic staff - could their situation potentially be considered differently from other (especially commercial) importers? Particularly if the Australian Government could supply them with a short list of accredited and trusted vets (and laboratories) in those countries that they could use.

We cannot see a timeline for introduction of the extended PEQ in the report, but urge the Department to consider some of the options and potential caveats proposed above.

The AVA also proposes a tightening of the system of identification and believe this is an ideal opportunity to require at least companion animals entering Australia to have a microchip which is:

- certified by a trusted agent in the exporting country (ie an accredited local veterinarian checks the chip number against description and at time of every test)
- readable within Australia – unfortunately there are many cases of animals arriving with a chip, readable by Quarantine, but not by the Australian microchip scanner network and so can be “lost” once it is released into the community. (To achieve this the chip needs to be an ISO chip, not, for example, an American encrypted chip)
- The chip should carry BOTH a country code and a unique identifier code. Australian standard 11784: Electronic animal identification, National coding scheme requires:
  - A 3 digit country code in conformance with ISO 3166 at bit nos 17-26 (country codes 900-998 “may be used to refer to individual manufacturers of transponders. Country code 999 is used to indicate that the transponder is a test transponder”
  - A unique “national identification code” at bits 27-64 (274,877,906,944 combinations)
  - It is the combination of the country code and the “within country” unique identification code that provides for world-wide unique identifiers
- The animal and its chip should be registered on one of the National microchip databases *before* release from quarantine, as well as with the State/Territory government / local council of the animal’s proposed residence. This will allow for ongoing traceability of imported animals.

The AVA thanks the Department for the opportunity to comment on the draft Report.

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