Government response to the Independent Review of Avian Quarantine

April 2006
Government response to the Independent review of avian quarantine
Preface

Following the case of avian influenza in a quarantine premises in Essex, the Secretary of State, Margaret Beckett, announced an Independent review of avian quarantine procedures for captive birds on 26 October 2005. This review was set up to examine quarantine arrangements and procedures, and make recommendations on any changes needed in order to ensure that the quarantine regime is as secure as possible in light of the evolving disease situation.

The report was published on 15 December 2005 and made 32 recommendations for changes to the quarantine regime. It can be found at: www.defra.gov.uk/animalh/diseases/control/avianquarantine/independentreview/index.htm

The review was carried out on a UK wide basis. Although animal health policy is a devolved area, this is a joint Government response from the Government, the Scottish Executive and the National Assembly of Wales.

The Government and the Devolved Administrations accept the general thrust of the report that the avian influenza and Newcastle disease risk posed by captive bird movements through properly implemented quarantine is very low. However, existing quarantine procedures should be improved to further reduce the risk, including that from non-compliance.

The Government and the Devolved Administrations either accept, or accept in principle, the majority of the recommendations. However, some of the responses are preliminary, pending further consultation with stakeholders, or completion of further studies, and we would welcome further debate on the issues raised as policy continues to develop in this field.

In addition, many recommendations suggest action at EU level. Where the response is 'Refer to EU' then we acknowledge that the Commission is responsible for taking any initiative which it considers necessary. Member States would assist in developing the Commission’s proposals and would ultimately vote on them by qualified majority. The UK will play an active and constructive part in this process. In April 2005 the European Commission requested the European Food Safety Authority to carry out a review of the animal health aspects of imports of captive wild birds, which is due to report in October 2006. This will inform EU policy and we await their opinion with interest.

The key elements of the response are as follows:

- Closer veterinary supervision and audit of quarantine by the State Veterinary Service (SVS)
- Creation of a central SVS database
- Revised guidance for structure and equipment of quarantine facilities
- Introduction of management plans for quarantine operators
- Bird welfare code for importers and quarantine operators
Enhanced laboratory testing of quarantined birds rather than reliance on sentinels

The report notes that the team was not able to consider fully wider issues of the trade in captive birds. These are complex and will require further consideration; we will take this work forward separately.

At the time of publication, there is an EU ban on captive wild bird imports from third countries, which is due to expire on 31 May 2006. The decision on whether to lift or extend the ban will take into account the evolving disease situation.

Below is the full response to the specific recommendations made in the report. This can also be found online at:
Recommendation 1: We recommend that Defra keep avian quarantine under review so that it continues to be fit for purpose.

Accept
The international avian disease situation is monitored continuously by both Defra and the European Commission. If the disease risk changes then the conditions for import of birds to the EU would be re-evaluated immediately, as has been the case recently.

Each year, we intend to publish a short report on the importation and quarantine of captive birds into the UK including:

- An assessment of the avian disease threat from exporting countries
- The number and type of birds imported to the UK from third countries
- The number of approved quarantines
- The level of compliance found by the State Veterinary Service (SVS) and action taken to rectify any serious non-compliances.
- Information on the welfare of birds in quarantine, including mortality
- Summary information on any disease incidents in quarantine

This information will be used to assess whether any changes are required to the implementation of quarantine in the UK.

Recommendation 2: We recommend that the objectives of quarantine for captive birds be re-examined, and that the contribution which quarantine is expected to make to (a) animal health (of both poultry and indigenous wild birds) and (b) public health be clearly defined, in order that appropriate and proportionate measures can be considered.

Accept in principle
The European Food Safety Authority is currently studying animal health and welfare aspects of captive bird imports, including quarantine, and is expected to report in October. We expect the outcomes of this report to inform future EU policy on quarantine.

In addition, the new EU avian influenza directive has redefined avian influenza to include H5 and H7 subtypes of low pathogenicity, to make these notifiable diseases.

The potential impact on indigenous wild birds will be considered in due course as part of new work to develop policy on wildlife disease. However, there is little to be done to manage introduction of disease through migration.

Public health risks to quarantine workers and the general population will be considered.
Recommendation 3: We recommend that data gathering be put in place in order to inform a quantitative assessment of risks, costs and benefits.

Accept
Although data gathering is already carried out, the data has been held in regional offices of the SVS and is difficult to access. Therefore, the SVS will keep a central record of data for each quarantine episode which is readily accessible and updated within three working days of completion of quarantine.

In addition, the Veterinary Laboratories Agency keeps records of all tests carried out. Therefore, numbers of samples submitted and the results of tests are available from their database.

At EU level, the Trade Control Expert System (TRACES) contains information on imports to all Member States. It is relatively new and we expect that the quality of data from this system will improve as officials across the EU become more familiar with it. We will discuss with the Commission what more can be done to validate TRACES data to minimise inputting errors.

We will be consulting separately on a regulatory impact assessment for costs related to importation and quarantine of captive wild birds.

Recommendation 4: We recommend that the EU Commission be asked to investigate and audit the implementation of EU rules on quarantine of captive birds in the Member States.

Refer to EU
We will support the Commission when it gathers information on the implementation of EU quarantine rules in Member States as part of any review of Decision 2000/666/EC.

Recommendation 5: We recommend that consideration be given to introducing an official veterinary health certificate for movements of all captive birds between Member States, and to the introduction of arrangements for the monitoring and control of such movements.

Refer to EU
We accept in principle that appropriate systems for the monitoring and control of movements of birds could improve traceability of birds in the event of a disease outbreak and aid the detection of illegal smuggling.

Recommendation 6: We recommend that pet and show birds be treated in the same way as other captive birds, and travel between Member States with a veterinary health certificate.

Further consideration
See recommendation 5.
Rules for movements of pet and show birds are currently governed by national legislation which is not entirely consistent with rules for commercial trade. We will consider whether this recommendation is a proportionate measure for citizens wanting to travel with genuine pets, or similarly intra-trade movements of “show birds”. It would be for the Commission to propose legislation to set EU wide rules.

**Recommendation 7:** We recommend that pet birds imported from third countries be subject to the same rules as other captive birds imported from third countries, and be quarantined in approved facilities, and not in the owner’s home.

**Reject**
EU legislation has not set rules for importation of pet birds so each member state has been free to make its own national legislation. However, the temporary emergency rules (Commission Decision 2005/759 as amended) for pet birds do apply harmonised standards across the EU to address risks from highly pathogenic avian influenza H5N1.

We consider that home quarantine with two veterinary visits is a satisfactory regime for pet birds and that the risk to animal and human health of continuing with this regime would be negligible, providing that, as now, there are no other birds held on the premises. We therefore propose reverting to the system of 35 days home quarantine, with two veterinary inspections, when the current emergency measures are revoked (in full or in part). As under the current guidelines, home quarantine would only be permitted providing there were no resident birds or poultry on the premises.

If, however, the Commission proposes an alternative regime which would give an equivalent level of protection then we would support it. This could be along the lines of the current emergency rules for H5N1, expanded to cover Newcastle disease and other types of avian influenza.

**Recommendations 8,9,10,11:**
- We recommend that the EU rules on pre-export conditions be revisited to ensure that the risk of bringing infected birds into the EU is minimised.
- We recommend that consideration be given to resuming imports of captive birds only from countries which can provide adequate veterinary health assurances.
- We recommend that consideration be given to adding suitable pre-export disease testing requirements to the veterinary health certification required for imports of captive birds from third countries.
- We recommend that consideration be given to requiring identification and certification of the individual history of the bird being imported.

Refer to EU
Recommendations 8,9,10,11 all have the same underlying intent – to minimise the likelihood that a bird is infected before it is imported to the EU.
We agree that this is desirable, in addition to quarantine, and will put these recommendations forward when discussing future rules for import with the Commission and other Member States. There may, however, be other solutions which provide an equivalent level of protection and these could also be acceptable.

In each case, we are mindful of the ability of different exporting countries to provide the assurances which we may wish to have. In particular, pre-export testing could give false security unless sampling is carried out efficiently and we can be confident that the laboratory operates to a high standard.

Paragraph 60 of the Dimmock Report acknowledges that there are significant welfare and practical issues surrounding the individual identification of certain types of birds.

**Recommendation 12: We recommend that exporters be required to send electronically documentation (including the veterinary health certificate) to the Border Inspection Post (BIP) at the same time as the BIP is given advance notice of shipment, and that the birds should not be shipped without the BIP’s prior approval.**

**Accept in principle**
Version 2 of TRACES, released on 11 February 2006, introduced electronic import certificates, accessible to the competent authorities of some exporting countries and creates the facility for prior electronic notification from these countries. If this facility is adopted widely then it should further improve the accuracy of data entry since the number and type of birds will be input at their point of origin.

However, at this stage prior electronic notification of all consignments is not yet available.

**Recommendation 13: We recommend that the official veterinarian at the quarantine facility be obliged to confirm to the BIP that the consignment has arrived and to ensure that any discrepancy in the consignment can be resolved.**

**Accept**
Decision 2000/666/EC requires that, following inspection of the birds at the BIP, the crates, cages, or transport vehicle must be sealed by the official responsible for the BIP in such a way as to avoid substitution of the contents during transport to the quarantine facility or centre.

Revised UK procedures will require that consignments are securely sealed at the BIP using a tamper-evident system and will be unsealed in the presence of the official veterinarian on arrival at the quarantine. There may be exceptional circumstances when, for animal welfare reasons, permission may be given by the SVS to vary this procedure.
TRACES has a facility to record the arrival of birds at the quarantine which may then be checked by the BIP. Until this is fully implemented in all Member States the SVS will keep a separate record of all consignments destined for quarantine in the UK in order to help detect any diversion of birds.

**Recommendation 14:** We recommend that vehicles used to transport birds from the BIP to the quarantine facility be approved for the purpose.

**Accept in principle**

We will put in place guidelines for transport vehicles to ensure that they can be securely sealed, cleansed, disinfected and safeguard animal welfare. They should therefore have a lockable, sealable load compartment or transport crate, be constructed so that they can be cleansed and disinfected (smooth, waterproof surfaces) and provide adequate ventilation. There should be a bulkhead between the driver and the load area. These guidelines will be applied at UK BIPs.

It would be ineffective for the UK alone to require official approval of vehicles because foreign operators are also entitled to collect birds through UK BIPs for onward transport to an approved quarantine in any Member State.

**Recommendation 15:** We recommend that where transport between the BIP and the quarantine facility is by road, the distance should be minimal.

**Refer to EU**

There are currently no restrictions under EU law on distances for road travel between the BIP and the quarantine facility and, for practical reasons, consignments sometimes come into a BIP in one EU member state to be transported on to quarantine in another.

Nevertheless, it is not desirable for birds to travel unnecessarily long distances by road and this will be taken into consideration when reviewing the fitness for purpose of the UK quarantine system.

**Recommendation 16 (part 1):** We recommend that -

- the EU Commission should be pressed to agree more detailed rules and common interpretation of the rules for the quarantine of captive birds at EU level as soon as possible, so as to avoid disparities between Member States undermining the disease protection which the rules seek to ensure;

**Refer to EU**

The UK would welcome more detailed language in Commission Decision 2000/666/EC to ensure common interpretation of the rules for the quarantine of captive birds.

Meanwhile, we have revisited the minimum standards currently laid down in EU law and are formulating clearer guidance for the SVS on their application.
Government response to the Independent review of avian quarantine

In some cases, this reflects existing guidance but reduces the discretion available to local DVMs.

Recommendation 16 (parts 2 and 3): We recommend that -
• the construction, equipment, operation and management of quarantine facilities should comply with ISO9001 requirements, and that the quarantine facility should be assessed by a UKAS accredited certification body; and
• the management should be required to pass an annual assessment, for example by way of a written test.

Accept in principle
We would encourage quarantine owners to meet ISO9001 standards but accept that this may not be practical for the majority of quarantines which are run as small businesses. Instead, we propose that all quarantine owners should put in place a detailed, auditable management plan outlining how they will operate their business in full compliance with EU and UK law. The SVS would audit the quarantine facility against this management plan during routine visits to ensure that the operator is taking a proactive approach. Assessment of management would therefore be continuous.

Recommendation 17: We recommend that -
• the full cost of approval of quarantine premises be recovered from the quarantine operator; and
• in order to avoid deflection of trade between Member States, charging for approval of quarantine premises should be adopted as a Community standard.

Further consideration
There is already a provision in Commission Decision 2000/666/EC or quarantine related costs to be borne by the importer.

We are considering the issue of cost-sharing for quarantine separately and will be holding a full 12 week consultation with stakeholders to look at related charges. This will be taken forward separately and decisions on charging will be taken later in the year.

We accept that there is a possibility that disparity between charging systems could divert trade to other Member States and we will take this into consideration.

Recommendation 18: We recommend:
• the SVS be required to make additional, unannounced visits to avian quarantine facilities, preferably when they are in use, and in particular to ensure that suitable standards of management and biosecurity are practiced;
• SVS assessors be trained to perform the assessments consistently;
• failure to observe rules correctly should result in the suspension of approval to operate as a quarantine centre as soon as any birds undergoing quarantine have been released; and
• the existing checklist be rewritten to exclude non verifiable questions, and to include suggestions on ways to verify the reliability of answers received.

Accept
SVS Veterinary Officers (VOs) will replace Local Veterinary Inspectors (LVIs) in the direct supervision of quarantine episodes, at least until the long term future of the trade and regulation of quarantine is settled.

The SVS will make at least one additional, unannounced visit per quarantine episode, to ensure that suitable standards of management and biosecurity are being practiced.

SVS staff responsible for quarantine will receive training to ensure that they are suitably qualified to assess standards for management and biosecurity.

The SVS will monitor quarantine facilities regularly to assess compliance with EU and UK standards. There will be clear instructions in place on the suspension of approval of quarantine facilities in the event of a detection of a serious breach in procedure.

The SVS will put into place a revised checklist, based around the management plan (see recommendation 16) against which the structure and management of a quarantine facility can be audited.

Recommendation 19: We recommend -
• training of LVIs be modified to include a post-training check on understanding of Defra requirements (e.g. a short written test at the end of the training);
• an audit process be developed and documented (e.g. in line with the requirements of ISO9001 clause 8.2.2) to conduct follow-up checks on site in order to check the continued effectiveness of the training; and
• re-training be provided annually, in order to bring LVIs up to date with latest Defra requirements and to re-check effectiveness of training (e.g. in line with the requirements of ISO9001 clause 6.2).

Accept in principle
See recommendation 18. VOs will replace LVIs in the direct supervision of quarantine episodes, at least until the long term future of the trade and regulation of quarantine is settled.

We will be arranging training for VOs in implementation of avian quarantine before imports of captive wild birds resume, and training will be refreshed on an annual basis. In addition, VOs will be audited internally.

Recommendation 20: We recommend -
• auditing by the LVI be introduced to include at least one unannounced check on quarantine facilities per quarantine period in order to determine whether or not all requirements are being
observed at all times and, in particular, if there are undisclosed illnesses or deaths, or unexplained reductions in numbers of birds;

- the final report from the LVI of the progress of the quarantine be enhanced to show that each individual requirement has been met, that the number of birds of each species present at the end of the quarantine can be reconciled with the number present at the start of the quarantine (taking account of any deaths which may have occurred) and recording the fate of every carcase;
- the LVI be obliged to report any discrepancies to the Divisional Veterinary Manager (DVM) of the SVS immediately they are detected; and
- the DVM be made responsible for final reconciliation of all of the figures, including the number of birds recorded at the BIP with those recorded at the quarantine facility; that the correct number of samples has been received for laboratory testing; and that the number of dead birds tallies with that received for post-mortem examination by the VLA.

Accept
The SVS will implement these recommendations through direct supervision of quarantine by VOs rather than through LVIs.

The SVS will carry out at least one unannounced visit to each quarantine episode. More checks will be carried out to premises with a history of poor compliance.

A report will be completed for each visit, targeted on critical controls such as reporting of deaths.

DVMs will retain responsibility for ensuring that all requirements have been met before releasing birds and for enforcing corrective action as at 21 below.

Recommendation 21: We recommend -
- when there is a breach of the rules in an occupied quarantine facility, that the quarantine period for the birds in the facility be restarted;
- when a breach is detected, no further birds should be permitted into the quarantine centre and, as soon as it is empty of birds, consideration be given to automatic suspension of approval of the quarantine centre until it can be demonstrated that the breach has been rectified; and
- the operator of the quarantine centre should be asked to meet the cost of re-approval when the breach has been rectified.

Accept in principle
There are a number of ways in which the rules could be breached and the appropriate response will differ for each of them.

If there has been a breach of procedure which casts doubt on whether all the birds in the quarantine have met the conditions for release, (typically because
the necessary tests for disease have not been carried out), then it would be appropriate to re-start the quarantine process.

Serious or persistent breaches of legislation, including deterioration of the structure of the quarantine facility, would justify withdrawal of approval once the current quarantine episode was satisfactorily completed. Re-approval could be chargeable once legislation to support SVS charging comes into force.

**Recommendation 22:** We recommend that consideration be given to commissioning work to determine the duration of shedding of specified avian influenza virus strains (e.g. highly pathogenic H5N1) in specified bird species.

**Accept**

Defra and BBSRC are jointly developing and prioritising future research requirements for avian influenza. The virus will be studied in a number of species in the course of this research and other projects which are in progress around the world, including research that is being financed by the European Commission.

However, it is unlikely to be feasible or ethical to carry out research involving laboratory infection of significant numbers of wild bird species.

**Recommendation 23:**

- samples should be taken from each species of bird in the quarantine facility, because of the possible variation in virus susceptibility between bird species; and
- the reduced level of sampling permitted for large populations of birds should be applied on a cage-by-cage basis rather than to the whole consignment.

**Accept in principle**

Samples will be taken from each species in the unit or facility.

We will take into account the epidemiological advice sought at Recommendation 24 when devising future sampling strategies. It is possible that the criteria for identification of groups to be sampled will not be determined by their cages. The numbers of samples to be taken are determined by Community law so these issues will also be taken forward at EU level. The EU commission and member states, including the UK, are currently working on an AI diagnostic manual, which will also be relevant to Recommendations 25, 26 and 27.
Recommendation 24: We recommend that an epidemiologist should be asked to review the sampling arrangements for birds in quarantine, in particular with a view to making expert recommendations on the proportion of birds that should be sampled when large numbers of birds are involved.

Accept
An epidemiologist has been asked to advise on sampling arrangements for live and dead birds. The numbers of samples to be taken depends on the definition of the epidemiological group, assumptions made about the expected prevalence of disease and the degree of confidence with which we would want to detect an infected consignment.

It is also important to consider sampling as part of a package of measures to manage the risk of introducing disease. A sampling strategy which is proportionate to the risk will therefore be devised when more is known about EU rules for import after 31 May 2006.

Recommendation 25: We recommend -

- research be commissioned to determine if sentinel birds can ever be effective at detecting avian influenza and Newcastle Disease viruses; and
- until research has shown that sentinels can be effective, the detection of avian influenza and Newcastle Disease viruses in quarantine should rely on laboratory tests.

Accept
Research work is currently underway at VLA which will help to gain a clearer understanding of the value of sentinels for detection of avian influenza.

We agree that until research has shown that sentinels alone can be considered effective at detecting avian influenza or Newcastle disease we will test samples from quarantined birds in accordance with a sampling regime to be finalised when we have a more complete understanding of the risks as imports resume.

Recommendation 26: We recommend that validation of RT-PCR testing for avian influenza and Newcastle Disease viruses be pursued, with a view to adding these tests to the Community standard as soon as possible.

Accept
In order to take immediate advantage of Reverse Transcription - Polymerase Chain Reaction (RT-PCR) technology, in particular the high sensitivity of the test and rapid reporting, VLA will test cloacal swabs and dead birds using the recently developed avian influenza RT-PCR. This will also help to validate the test.
This test is not yet specified in EU law and there is no suitable PCR for Newcastle disease. We will therefore also continue to use virus isolation for the time being, in accordance with Commission Decision 2000/666/EC.

**Recommendation 27:** We recommend that steps be taken to ensure that standing regulations on sampling are adhered to.

**Accept**
The SVS will require full compliance with legal requirements for both routine sampling of live birds and post mortem examination of dead birds.

**Recommendation 28:** We recommend -
- processes for checking that deaths are recorded be introduced (e.g. the numbers of birds released from quarantine be compared with the TRACES notification of numbers taken in); and
- the report submitted by the LVI to the SVS at the end of the quarantine period should demonstrate that each part of the quarantine conditions has been complied with, and should reconcile the number of birds entering quarantine, taking account of any deaths which may have occurred, with the number available for release at the end of the quarantine period.

**Accept**
It is already a legal requirement under Commission Decision 2000/666/EC for a daily record to be kept of all deaths. This will be addressed in the management plan and enforced by the SVS.

The SVS is setting up a data collection system so that bird numbers can be reconciled and compliance with quarantine conditions confirmed before birds are released.

However, it will not always be practical to count live birds with absolute precision so apparent discrepancies could arise, even when the rules have been fully complied with. In addition, it should be noted that there is the potential for human error when inputting data TRACES.

**Recommendation 29:** We recommend that, on request, the VLA provide a full post-mortem service to owners of quarantine facilities, or that this is carried out by another (suitably approved) laboratory that is capable of carrying out a full avian post-mortem with the necessary containment facilities for sampling carcases which may be infected with avian influenza and Newcastle Disease viruses.

**Accept**
We agree that the owner of the quarantine or birds has a right to have a full post-mortem conducted on a bird that dies in quarantine. This can be beneficial in establishing a differential diagnosis of non-notifiable disease when there is high morbidity or mortality.
The VLA will provide this service at the owners’ expense, and the SVS will ensure that quarantine owners are aware of this.

**Recommendation 30:** We recommend that management of a quarantine facility be required, in line with ISO 9001 clauses 4.1 and 4.2.3, to plan, identify and document the processes and interactions involved.

**Accept in principle**
We are working with the industry to develop a management plan as per recommendation 16.

**Recommendation 31**
- the welfare standards which should be met during transport to and inspection of birds at the BIP, transport to, and stay at quarantine facilities be reviewed;
- the LVI be responsible for auditing welfare during quarantine; and information on welfare of birds in quarantine be collected by the SVS and published regularly.

**Accept**
It is primarily the responsibility of the quarantine owner to ensure the welfare of birds in their care.

We are developing a voluntary welfare code of practice in partnership with industry and other stakeholders. This will be trialled and improved as imports resume and may eventually be adopted under the new Animal Welfare Act currently being considered by parliament. The SVS will monitor welfare during routine visits to quarantine premises.

The SVS will collate basic data on their findings and this will be summarised in the report to be published annually (see recommendation 1 above).

The Welfare of Animals in Transport Order (WATO) sets out welfare standards for animals, including birds, in transport.

**Recommendation 32**
- guidance be drawn up on control of infection to provide generic measures to prevent transmission of all potential infections; and

**Accept**
We agree that guidance is necessary and we will publish guidance for transporters, quarantine and BIP workers.

- personal protection equipment should be given to staff working in quarantine facilities.

**Accept**
Commission Decision 2000/666/EC requires that persons entering a quarantine facility must wear protective clothing including footwear. As part of the management plan, SVS staff will check compliance with this requirement.
In addition, all SVS staff entering a quarantine premises are required to wear personal protection equipment.