

The Audit Office of NSW

Performance Audit Report – NSW
Agriculture

Managing Animal Disease Emergencies

Comment by the Association of District Veterinarians of
NSW

This submission is based on field veterinarians' perspectives on the recommendations of the 2002 Performance Audit Report and deals with the following terms of reference:

- 1. Implementation of the reports' recommendations and their relevance under current administrative arrangements.**
- 2. The State's preparedness to manage animal and plant disease emergencies, particularly with respect to:**
 - Risk based planning and disease surveillance;
 - The effectiveness of immediate response mechanisms;
 - Intergovernmental cooperation and the State's compliance with national standards; and
 - Cost sharing arrangements between industry and Government.
- 3. The effectiveness and efficiency of the management of endemic diseases, including the roles of government and industry.**
- 4. Any other related matters.**

The Association of District Veterinarians only became aware of the inquiry following the posting of the Inquiry on the RLPB website on the 24/4/06. This occurred at a time when the President of the Association was absent on leave. As such the Association has had insufficient time to implement a comprehensive process of consultation with its members and drafting of a detailed document that this Inquiry deserves.

It is hoped that this brief submission will make the Inquiry aware of the concerns that the Association of District Veterinarians has regarding the management of Animal Health and Emergency Animal Disease Preparation in NSW, and in particular the failure of NSW Department of Primary Industries (DPI) and State Council of Rural Lands Protection Boards to jointly take responsibility for leadership in this matter.

Members of the Association of District Veterinarians are available to answer questions regarding the submission.

Yours sincerely

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President

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1. Implementation of the reports' recommendations and their relevance under current administrative arrangements. (Performance Audit Report – Managing Animal Disease Emergencies p7)

Risk Based Planning

There have been no initiatives on the recommendation with respect to risk-based planning that have been observed at the field level.

Disease Surveillance

Some funds have been made available for laboratory testing as part of disease surveillance but there has been no active program to ensure that these funds are used for anything other than *ad hoc* disease investigation.

The 2002 review was critical of the high level handling of the 1999 Mangrove Mountain outbreak. Those responsible for the problems experienced at Mangrove Mountain were also responsible for the 1999 policy (Circular 99/101) introducing diagnostic charging for almost all laboratory submissions (with few exceptions). Even some of the diseases listed as diseases of importance by the OIE now attract a charge.

This has lead to a situation where we are training farmers **not** to call in veterinarians where it involves laboratory testing because of cost. That means that farmers are unlikely to report the early signs of an emerging or exotic disease for fear of a large bill. This is demonstrated by the diagnosis of virulent Newcastle disease at Blacktown. The owner advised the District Veterinarian at Moss Vale he would never have paid for all the tests which were done to exclude the endemic poultry diseases. In conclusion, **there is a negative impact of the diagnostic charging policy on our ability to detect important diseases and the chances of early detection of exotic disease in NSW have been significantly reduced.**

In addition, the 2002 review identified the decreasing number of livestock veterinarians. There have been no initiatives to increase the number of veterinarians serving the livestock industries of NSW. Even in situations where DPI has a direct influence with District Veterinarian and Departmental Veterinary Officer positions, these have often remained unfilled for periods in excess of 12 months.

Chief Veterinary Officer

Administrative changes may well have been made to address this recommendation but there is no direct evidence of it.

It is unclear why the NSW Chief Veterinary Officer (CVO) should have the responsibilities of plant and bee health issues. The review committee should look at the position of CVO in other states such as Victoria & Queensland and consider restructuring of the position to:

- minimize the bureaucratic restraints
- removal of plants and bees from the CVO portfolio
- provide an independent budget

Immediate Response Funding

There is no evidence that any progress has been made in response to this recommendation

Response Benchmarks

This may well have been considered but there is no evidence of any action in this area.

Tracing Animals

NLIS has been implemented state wide. There are concerns with the current capability of the system. It is hoped, however, that we will have state of the art capability in this area in the future.

Animal Disposal

The First Response Team has been working on this matter.

It should be noted that the Audit report and response from NSW Agriculture (DPI) are at odds with the concerns faced in the field. Both the 2002 reports concentrate heavily on the disposal of dead animals. This is obviously a result of the experience at Mangrove Mountain in 1999. Equal consideration should be given to the investigation side of an Emergency Animal Disease response.

Information Systems

The development of an information system is at the serious discussion stage. However we still do not have a standardized, fully functional, and suitable disease recording database. Disease investigation without a statewide standardized database program is not surveillance. The lack of such a basic tool is not common knowledge outside the state and would not reflect well on the integrity of our surveillance program.

Regulation of Swill Feeding

No progress has been made in response to this recommendation

Cross Border Co-operation

No progress has been made in response to this recommendation

Revision of Response Plan

Some parts of the plan have been revised.

State Disease Control Headquarters Operating Procedures

There has been no public information on the progress or otherwise in response to this recommendation.

2. The State's preparedness to manage animal and plant disease emergencies, particularly with respect to:

- **Risk based planning and disease surveillance;**
- **The effectiveness of immediate response mechanisms;**
- **Intergovernmental cooperation and the State's compliance with national standards; and**
- **Cost sharing arrangements between industry and Government.**

Risk based planning and disease surveillance

The State's preparedness to deal with an Emergency Animal Disease (EAD) is dependent on planning and this includes having appropriately trained staff. In addition, despite NSW DPI being the combat agency for an EAD, there is an increasing reliance on RLPBs to provide staff and resources in a response.

The Memorandum Of Understanding (MOU) between NSW DPI and RLPBs is poorly written and vague and has created an environment of responsibility shifting and confusion in many aspects of Animal Health. This has resulted in 2 main areas which are inhibiting the effectiveness of NSW's response to an EAD:

1. NSW DPI has not taken the lead role in providing EAD Preparedness (EADP) training to Board staff.
2. A lack of acceptance by State Council of Rural Lands Protection Boards in the importance of EADP

As a result of NSW DPI restructuring, the First Response team has a reduced number of NSW DPI trained veterinarians identified in control centre roles, particularly within Veterinary Investigations. In fact the restructure has severely weakened the ability to respond in the expected manner.

Where NSW DPI staff have Local Disease Control Centre (LDCC) roles, they do not appear to be provided with adequate time or resources away from their day jobs to take the lead role in EADP.

Traditionally District Veterinarians have assisted NSW DPI in EAD responses by providing expertise in Field Surveillance roles and LDCC roles within the Veterinary Investigations section.

In the past two years, District Veterinarians have not received any formal EADP training. In addition there are a number of newer District Veterinarians who have had no formal EADP training at all.

NSW DPI stated in their response that Standard Operating Procedures (SOPs) have been written for all aspects of the LDCC. In the Acting Director General's response of 19 April 2002 he advises that *"..Revision of the response plan is well advanced with the inclusion of Standard Operating Procedures to cover all areas of control centre and*

Headquarter activities.” There has been progress in the development of SOPs however there is still a significant deficit within the Veterinary Investigations section. This is due mainly to the lack of input and direction from NSW DPI. It is inappropriate to expect boards to allocate District Veterinarians’ time to develop SOPs, when NSW DPI, as the lead agency, does not recognise it as a priority.

Another issue already identified in the report is that of the declining numbers of practicing livestock veterinarians in the Department and private practice. This is a major concern for emergency preparedness and limits the effectiveness of state wide disease surveillance.

In conclusion the Association agrees with the Report in its comment under Early Intervention (p37), “...*Substantial benefits are gained from investment in the prevention and early intervention and control of disease outbreaks. Rapid detection and response are critical for successful eradication and to minimise the total size and cost of an outbreak. Adequate funding and resources are essential to support preparedness and ensure that early detection and response are achieved.*”

The effectiveness of immediate response mechanisms

The effectiveness of an EAD response depends on how quickly a disease incident is detected. Disease detection is improved by:

1. Providing state-wide, coordinated and target driven surveillance programs
2. Encouraging laboratory submissions
3. Encouraging industry notification - there is an increasing reliance on self regulation of industry. As a result, targeted surveillance programs are being replaced by the reliance on industry notification. There are several factors which have a direct effect on the ability to self regulate:
 - a. economic pressure + adverse seasonal conditions
 - b. the age of livestock managers on traditional family farms & their reduced capabilities
 - c. decay of infrastructure – handling facilities, fences etc
 - d. impact of subdivision & absentee owners
 - e. the social trend against regulation & communal responsibility. ie. doing what’s right for others despite personal consequences.

These trends have significantly reduced our response capabilities at the industry level, compounding the deficiencies at government level. If the response capability of industry is declining then the government will need to increase resources, funding and surveillance.

Intergovernmental cooperation and the State’s compliance with national standards and cost sharing arrangements between industry and Government

It is beyond the scope of the District Veterinarians’ Association to comment on this area.

3. The effectiveness and efficiency of the management of endemic diseases, including the roles of government and industry.

The NSW Animal Health system has had a number of major achievements, being Tuberculosis, Brucellosis and Bovine Pleuropneumonia eradication. Ovine Footrot has been a success but still requires more resources and time to achieve its goals.

These gains occurred when there was a strong animal health system with strong leadership and planning from the NSW Agriculture Executive. In the past, NSW Agriculture had a large number of staff in the field and in middle management areas. The system was integrated with the RLPB system. District Veterinarians and Rangers performed their duties under the control of the Chief of Animal Industries. More resources were available to perform trial work on properties to determine risk factors, prevalence etc.

The fragmentation of NSW Agriculture and the decimation of staff numbers due to redundancies (including the total loss of middle management) have had repercussions felt throughout the state based Animal Health system. (Many of the areas identified previously in this submission are also relevant to the management of endemic diseases.)

Today, there are very few NSW DPI staff on the ground and the key areas of leadership and planning are not readily apparent.

Animal health responsibilities have been placed with RLPBs along with the separation of District Veterinarians from NSW DPI. This relationship was to be defined by the current MOU. (As stated previously, the MOU is ill defined and has created much blame shifting.)

The loss of passive surveillance due to the laboratories charging fee for service has also resulted in decreased surveillance.

4. Any other related matters

Due to time restraints this area has not been covered.