

# TRANMISSIBLE SPONGIFORM ENCEPHALOPATHIES FREEDOM ASSURANCE PROGRAM

2022-23 FINAL REPORT



# **Contents**

INTRODUCTION	3
PROGRAM AIM PROGRAM OBJECTIVES STAKEHOLDERS	4 4 4
ASSESSMENT AGAINST DELIVERABLES	5
NATIONAL TSE SURVEILLANCE PROJECT WOAH Consistent Surveillance System BSE Scrapie RUMINANT FEED BAN COMPLIANCE SCHEME Importation of stockfeeds, stockfeed ingredients and stockfeed additives IMPORTED ANIMAL QUARANTINE AND SURVEILLANCE SCHEME	5 5 6 7 11 13
COMMUNICATIONS	13
PROGRAM MANAGEMENT	14
FINANCIAL REPORT	14



# INTRODUCTION

There are a number of transmissible spongiform encephalopathies (TSEs) that affect people and animals. Of most interest to Australia's livestock industries are bovine spongiform encephalopathy (BSE) of cattle and scrapie of sheep.

BSE has never been recorded in Australia. Scrapie has occurred once, in imported sheep on a single property in 1952. It was promptly eradicated. Two cases of feline spongiform encephalopathy have been diagnosed in imported animals in Australian zoos in 1992 (cheetah) and 2002 (Asiatic golden cat). In both instances, effective response measures were undertaken.

Australia's livestock continue to remain free from TSEs. National and international risk assessments have concluded that Australian cattle do not present a BSE risk. However, Australia's status can only be assured if we continue to apply vigorous preventive measures complemented by an ongoing surveillance program meeting international standards. These processes need to be well coordinated, nationally uniform, transparent and auditable in order to maintain our trade access. The TSE Freedom Assurance Program (TSEFAP) was formed to integrate all TSE measures into one national program with clear and nationally integrated operational components and a transparent funding framework.

At the 2003 FMD/BSE Policy Forum it was agreed that a national TSE Freedom Assurance Program be developed with the following operational components:

- Active TSE surveillance (the current NTSESP);
- 2. Ruminant feeding restrictions, including audit, feed sampling and testing;
- 3. Imported ruminant surveillance, including buy-back schemes for certain imported cattle;
- 4. Surveillance and management of designated imported zoo animals;
- 5. Communications, including the production of advisory material for industry, etc.;
- 6. Research and development, including validation, adoption and technology transfer of diagnostic tests.

In January 2004, TSEFAP was instigated by Animal Health Australia (AHA). Since then, TSEFAP has become an integral part of AHA's work program peaking with the World Organisation for Animal Health (OIE, now WOAH) deciding in 2006 to rate Australia as BSE Free and again in 2007 to rate Australia's BSE risk as 'Negligible'.

TSEFAP is independently reviewed at the end of each Business Plan, with the last one carried out by Herd Health Pty Ltd in 2023. They found that stakeholders consider the TSEFAP to be to be suitably designed, funded, managed, and integrated, supported by all stakeholders, and which is continuing to achieve its objectives. The review produced four recommendations which were discussed by the TSEFAP National Advisory Committee.

The TSEFAP is now entering its fifth Business Plan which covers the period from July 2023 to June 2026. It provides the framework to meet the identified requirements for a nationally integrated approach to animal TSE risk-reduction measures in Australia.

This report provides information on the last 12 months (July 2022 to June 2023) of activity undertaken within the TSEFAP.



# **PROGRAM AIM**

TSEFAP will enhance market confidence that Australian animals and animal products are free from TSEs through the structured and nationally integrated management of animal-related TSE activities.

#### PROGRAM OBJECTIVES

- 1. Maintain Australia's freedom from BSE and scrapie and the highest level of international rating
- 2. To carry out sufficient surveillance to meet international requirements and assure trading partners, markets and consumers that Australian animals and animal products are free of TSEs and to ensure the early detection of a TSE (should it occur).
- 3. To demonstrate that no restricted animal material is fed to ruminants.
- 4. To manage the risks posed by animals imported from countries that have had nativeborn cases of TSE.
- 5. To provide a forum to involve all stakeholders in addressing animal-related TSE issues.

## **STAKEHOLDERS**

The following organisations are considered to be the major stakeholders in this project and are involved in the development of the Business Plan and in many cases its funding. These stakeholders will also be required to have some involvement with the operations of the TSFFAP.

- Australian Government Department of Agriculture, Fisheries & Forestry (DAFF)
- Food Standards Australia and New Zealand (FSANZ)
- Australian Commonwealth Scientific & Industrial Research Organisation (CSIRO)
- Department of Primary Industries, NSW
- Department of Agriculture & Fisheries, QLD
- Department of Industry, Tourism and Trade,
   NT
- Department of Primary Industries & Regional Development, WA
- Primary Industries and Regions, SA
- Agriculture Victoria, VIC
- Department of Natural Resources & the Environment, TAS
- Environment, Planning and Sustainable Development, ACT

- SAFEMEAT
- Cattle Australia (CA)
- Australian Lot Feeders' Association (ALFA)
- Australian Dairy Farmers (ADF)
- Sheep Producers Australia (SPA)
- WoolProducers Australia (WPA)
- Goat Industry Council of Australia (GICA)
- Australian Meat Industry Council (AMIC)
- Australian Meat Processor Corporation (AMPC)
- Australian Renderers' Association (ARA)
- Stock Feed Manufacturers' Council of Australia (SFMCA)



# **ASSESSMENT AGAINST DELIVERABLES**

### NATIONAL TSE SURVEILLANCE PROJECT

The aim of the NTSESP is to demonstrate Australia's ongoing freedom from BSE and classical scrapie through an integrated national program. It aims to achieve this by:

- Maintaining a TSE surveillance system that is consistent with the WOAH Terrestrial
   Animal Health Code and assures all countries which import cattle and sheep
   commodities that Australia remains free of these diseases
- 2. Ensuring the early detection of TSEs should they occur in Australia's livestock so that an appropriate, early response can be mounted under AUSVETPLAN to protect the health of Australia's people and livestock
- 3. Reviewing the needs and priorities of TSE surveillance and advising Animal Health Australia and Animal Health Committee (AHC).

## WOAH CONSISTENT SURVEILLANCE SYSTEM

#### **BSE**

Until 2023, the WOAH required that a country must meet a points target, which was based on the adult cattle population and the risk category that the WOAH recognises the country as being. Australia is a country assessed by the WOAH as BSE *Negligible Risk* and therefore implemented WOAH Type B surveillance prior to and including 2022-23. The application of WOAH Type B surveillance is designed to allow the detection of at least one BSE case per 50,000 in the adult cattle population at a confidence level of 95%. Australia's target was to achieve a minimum of 150,000 surveillance points during a seven-year moving window. Australia should also meet WOAH recommendations to investigate all clinically consistent cattle regardless of the number of points accumulated, and ensure that cattle from the fallen and casualty slaughter subpopulations are also tested.

Table 1 below is used to determine the WOAH point values of each BSE surveillance sample collected. Points are assigned to each sample according to the animal's age and cattle subpopulation from which it was collected. The points are determined by the relative likelihoods of expressing BSE by age and sub-population, according to scientific knowledge of the disease. The WOAH recommends that samples should be collected from at least three of the four subpopulations, but that ages and sub-populations sampled should reflect the demographics of the cattle herd.

Note: The WOAH Terrestrial Code Chapter 11.4 (Bovine spongiform encephalopathy) was updated in the latter half of 2023, notably with removal of the points-based system. Article 11.4.20 details the updated requirements for surveillance. In brief, animals falling on the clinical spectrum of BSE should be targeted for surveillance, with a focus on individually affected animals rather than group events. Future TSEFAP reports will reflect the removal of the 'points' target, although the number of eligible clinically-consistent animals examined is expected to remain constant as a proportion of the national cattle population.



TABLE 1: SURVEILLANCE POINT VALUES FOR SAMPLES COLLECTED BY SUBPOPULATION AND AGE

Routine	Fallen	Casualty	Clinically			
slaughter	stock	slaughter	consistent			
Age ≥ 2 years and < 4 years (young adult)						
0.1	0.2	0.4	260			
	Age ≥ 4 years and < 7 years (middle adult)					
0.2	0.9	1.6	750			
	Age ≥ 7 years a	nd < 9 years (older adult	·)			
0.1	0.4	0.7	220			
Age ≥ 9 years (aged)						
0.0	0.1	0.2	45			

The NTSESP for the period 1 July 2022 to 30 June 2023 collected and tested samples from 315 cattle that were clinically consistent with BSE, fallen and injured cattle, equating to 68,727 points. All samples were found to be negative for BSE.

Table 2 provides a summary of numbers of animals examined (and their points) and includes samples collected by Australian Government DAFF, exported from the National Animal Health Information System (NAHIS) database. The total number of animals included is lower than 2021-2022, but the number of points well above the seven-year average required.

TABLE 2: NUMBER OF SAMPLES TESTED FOR BSE (AND THEIR POINTS) DURING 2022-23.

Jurisdiction	No. examined	No. points	No. positive
NSW	45	7078.2	0
NT	8	3785	0
Qld	83	21,091.2	0
SA	16	5192.6	0
Tas	25	2732.5	0
Vic	126	23,512.5	0
WA	12	5335	0
Australia	315	68,727	0

#### Scrapie

The NTSESP is a formal program of targeted surveillance, which is consistent with the WOAH Terrestrial Animal Health Code (2019) recommendations for countries to be considered free from scrapie (Article 14.8.3, 2a).

Article 14.8.3, point 2a requires:

- i) scrapie has been notifiable for at least 25 years; and
- ii) a formal programme of targeted surveillance and monitoring, which includes testing of sheep and goats displaying clinical signs compatible with scrapie and those over 18 months of age slaughtered, culled or found dead on farm, can be documented as having been in place for at least 10 years; and



iii) appropriate measures to prevent scrapie introduction can be documented as having been in place for at least 25 years; and

- either scrapie has never been reported; or
- no case of scrapie has been reported for at least 25 years.

The sampling design of the NTSESP is based on the requirements of a previous version of the WOAH Terrestrial Animal Health Code chapter on scrapie, and it continues to meet the current chapter requirements.

The NTSESP for the period 1 July 2022 to 30 June 2023 has collected and tested 291 samples from sheep that were clinically consistent or injured and fallen. There were also 9 samples taken from goats. All samples were found to be negative for classical scrapie.

Table 3 provides a summary of samples collected, tested and entered into the NAHIS database and includes DAFF samples. Numbers were slightly lower than for 2021-22.

TABLE 3: THE NUMBER OF SHEEP AND GOAT SAMPLES COLLECTED AND TESTED FOR SCRAPIE FOR 2022-23

Jurisdiction	No. sheep samples examined	No. goat samples examined	No. positive for classical scrapie
NSW	50	0	0
NT	1	0	0
Qld	12	0	0
SA	23	0	0
Tas	2	1	0
Vic	106	8	0
WA	97	0	0
Australia	291	9	0

## RUMINANT FEED BAN COMPLIANCE SCHEME

The aim of the RFBCS is to enhance market confidence that Australian animals and animal products are free from TSEs by demonstrating that no restricted animal material is fed to ruminants. This is achieved by:

- 1. Coordinating a risk-based compliance inspection/audit program that targets all sectors in the livestock feed chain
- 2. Ensuring quarantine measures prevent the entry of the BSE agent to Australia
- Complementing official regulatory and inspection/audit programs with quality management and assurance measures implemented by the ruminant livestock and stockfeed manufacturing industries
- 4. Creating awareness and developing the necessary competencies and capacity regarding legislative rules on animal feed and TSEs through education and training programs
- 5. Collating and reporting these activities at a national level.

Every (financial) year each state undertakes a risk-based inspection program. At the same time industry undertakes audits of their constituents against standards that reflect the



prohibition of feeding of restricted animal material to ruminants. The results of the inspections and audits are compiled into an annual activity report and provided to SAFEMEAT and the Animal Health Committee (AHC). The annual return for the 2022-23 financial year can be found in tables 4 to 7.

**TABLE 4: JURISDICTIONAL RFB INSPECTIONS FOR 2022-23** 

	Renderers	RAM only (monogastric) feed manufacturers	Only no RAM feed manufacturers	Mixed feed manufacture Single lines	Mixed feed manufacturers Separate lines	Retailers	End-users / Farmers	TOTAL
Total number of businesses/ properties	72	38	144	24	10	1,445 <sup>1</sup>	314,600²	Approx. 316,300
Number requiring inspection/ 12 months	21	19	49	20	8	155	149	421
Number inspected	20	19	53	19	8	186	206	511
Number CARs issued in current FY –Critical non-conformities (A)	0	0	0	0	0	0	2	2
Number CARs issued in current FY – Major non-conformities (B)	0	2	2	1	1	19	2	27
Number CARs finalised of those issued in current FY (C)	0	2	2	1	0	17	4	26
Number of CARs carried forward from last report (D)	0	0	0	0	0	0	0	0
Number of CARs carried forward from last report and finalised since last report (E)	0	0	0	0	0	0	0	0
Number of CARs to be carried forward to next FY (F)	0	0	0	0	1	2	0	3
Number of feed samples tested	0	0	24	22	8	5	3	62
Number of feed samples negative for RAM	0	0	24	21	8	5	3	61
Number of prosecutions	0	0	0	0	0	0	1	1

**NB:** Number carried forward from this financial year plus number carried forward from last financial year should equal the total number to be carried forward to next financial year i.e. (A+B-C)+(D-E)=F

<sup>&</sup>lt;sup>1</sup> Estimate

<sup>&</sup>lt;sup>2</sup> Estimate



**TABLE 5: END-USER INSPECTIONS 2022-23** 

End-users Inspected									
	NSW	NT	QLD	SA	TAS	VIC	WA	ACT	TOTAL
Cattle- Feedlot	0	0	1	0	0	0	0	0	1
Cattle – Grass fed	0	1	1	2	0	0	2	0	6
Sheep or goats	0	0	0	4	0	0	0	0	4
Mixed (ruminants with pigs and/or poultry)	111	0	17	12	2	41	12	0	195
Other ruminants (e.g. deer, buffalo, camels)	0	0	0	0	0	0	0	0	0
Pigs	0	0	0	0	0	0	0	0	0
Poultry	0	0	0	0	0	0	0	0	0
Total	111	1	19	18	2	41	14	0	206
Number of inspections required to meet Uniform Guidelines	52	1	25	15	5	37	14	0	149

TABLE 6: FEED SAMPLES COLLECTED AND TESTED FOR RAM DURING 2022-23

	Number of Samples Required	Number of Samples Tested	Number of Positive Results for Ruminant Feed	Comments
QLD	16	9	0	Due to staff changeover, feed sampling numbers were down this year.
NSW	17	21	1	One manufacturer positive result, later tested and negative for RAM.
VIC	18	18	0	There were also two end user investigations where a positive result was found in testing accessed material.
TAS	1	0	0	Due to staff changeover, feed sampling was not completed this year. Will do next year.
ACT	0	0	0	
SA	6	7	0	
WA	6	6	0	
NT	1	1	0	
TOTAL	65	54	1	



TABLE 7: INDUSTRY FOOD SAFETY AND QA THIRD PARTY AUDITS (2022-23)

		Number of program participants	Number inspected during year		Number of CARs referred to Jurisdictions	Number of CARs finalised 30 June 2023
LPA Food Saf	ety Program	177,464	5,298	0	0	0
LPA Quality Ass	urance Program	148 <sup>3</sup>	118	0	0	0
National Feedlo		340	367 <sup>4</sup>	0	0	0
	QΓD	279	17	0	0	0
	NSW	462	2121	0	0	0
	VIC	2,796	742	0	0	0
Dairy Quality	TAS	358	331 <sup>5</sup>	0	0	0
Assurance	SA	188	188	0	0	0
	WA	150 <sup>6</sup>	07	-	-	-
	Total Dairy	4,233	1,399	0	0	0
Feed	Safe	175 <sup>8</sup>	175	0	0	0
Australian Reno	lering Standard	83	78	0	0	0
то	ΓAL	182,443	7,435	0	0	0

<sup>&</sup>lt;sup>3</sup> LPA QA Participants = 108 Cattle & 26 Flockcare, audits completed for 93 Cattle Care & 25 Flockcare; plus 14 from the NT

<sup>&</sup>lt;sup>4</sup> NFAS Audits Completed is greater than the number of participants. This is a result of Feedlots that are in Voluntary Suspension (VS) having an interim audit when VS period of 24 months has expired. 340 is the number of current fully accredited NFAS feedlots.

<sup>&</sup>lt;sup>5</sup> The TDIA currently has 358 licensed dairy farms in the state. Of these, 295 were audited in the specified time period. The number of inspections (331) exceeds the number of auditees as some farms were re-visited following compliance issues. No CARs were issued in relation to ruminant feed ban compliance.

<sup>&</sup>lt;sup>6</sup> Estimate based on previous reports.

<sup>&</sup>lt;sup>7</sup> WA Health is still in the process of rebuilding the dairy food safety regulatory program. There was no QA audit information to contribute to the RFB reporting for 2022-23.

<sup>&</sup>lt;sup>8</sup> There are 122 businesses located over 175 FeedSafe certified sites. There are an additional 16 sites working towards FeedSafe certification. An additional 70 to 90 sites are not FeedSafe certified. These sites only produce about 10% of the national throughput which will be close to 9.8 million tonnes for 2022-23. SFMCA is working to bring these sites into meeting the same requirements as the membership.



Jurisdictional inspection numbers were largely on target (Tables 4-6). One end-user investigation in Victoria proceeded to prosecution.

Most categories have generally had good levels of compliance with the Ruminant Feed Ban (RFB) except for the stockfeed retail sector that always has more issues. However, most issues detected tend to be minor (e.g. non-RAM labelling) and are corrected fairly quickly. This is a difficult sector to communicate with as there is no peak body and can have high turnover of staff. However, Animal Health Australia and some of the jurisdictions will continue to target stockfeed retailers with communications about their RFB requirements in the coming year.

There were 7,435 industry quality assurance audits completed nationally with no CARs issued for RFB issues.

## Importation of stockfeeds, stockfeed ingredients and stockfeed additives

The Australian Government Department of Agriculture undertakes TSE risk assessments on import permit applications for stock feeds, stock feed ingredients (including fishmeal) and stockfeed additives. Assessments are conducted in accordance with the policy "Importation of stockfeed and stockfeed ingredients – Finalised risk management measures for transmissible spongiform encephalopathies, September 2015" (TSE policy).

There are two areas of the department responsible for these assessments - the Animal and Biological Imports Branch (ABIB) and Plant Import Operations (PIO). ABIB and PIO work collaboratively on the biosecurity risk assessment for animal disease risks, including prion diseases.

Permit issuing areas will seek case specific advice from Animal Biosecurity and Plant Biosecurity branches where a specific risk assessment falls outside the scope of the TSE policy.

All import permit applications for stock feeds, stock feed ingredients and stock feed additives must be accompanied by a completed 'Production Questionnaire for Animal Feed'. Applications not accompanied by a completed questionnaire will not be processed.

In assessing import permit applications for these commodities, the permit issuing areas take into consideration all relevant information including:

- Sourcing of ingredients (e.g. animal, plant, fermentation, synthetic)
- Country of origin of the manufacturing facility
- Manufacturing processes
- Manufacturer's quality systems, and
- Transport and storage of ingredients/final products.

Consignments of stockfeed, stockfeed ingredients and stockfeed additives may be sampled and tested for mammalian and avian DNA before being released from biosecurity control.

Consignments of stock feed are subjected to analytical testing for the presence of ruminant-derived materials in any of the following cases:

a) The product is transported in bulk and the cleanliness of containers or ships holds <u>before</u> export cannot be guaranteed to the satisfaction of officers from the department through, for example, a pre-approved arrangement;



OR

b) The product is transported in bulk but at inspection on arrival the cleanliness of containers/holds is not confirmed and there is a risk of contamination with ruminant derived materials;

OR

c) The product is packaged in packages that are not clean and new;

OR

d) At inspection upon arrival the integrity of packaging is found to be deficient.

Consignments of stockfeed packed in bags must be accompanied by a declaration from the manufacturer confirming that the product is packaged in clean, new packaging. This provides additional assurance that the risk of cross contamination is acceptably low.

The following tables contain information on the permit-related activities of ABIB and PIO:

TABLE 8. ABIB STOCKFEED PERMIT RELATED ACTIVITIES (1 JULY 2021 – 30 JUNE 2023)

Requirement	2021/22	2022/23
Permits requiring mandatory testing on arrival	1	1
Permits for non-avian meat and bone meat from NZ	0	0
Permits for dairy based stockfeed from NZ	1	3
Permits for fishmeal from NZ	1	1
Permits for fishmeal from countries other than NZ	53	45
Permits requiring DNA testing on arrival if contamination or deficient packaging found.	73	56
Number of facilities audited by ABIB (or approved 3 <sup>rd</sup> party) under these guidelines	0	0

# TABLE 9. PIO PLANT BASED STOCKFEED RELATED ACTIVITIES (1 JULY 2021 – 30 JUNE 2023)

Requirement	2021/22	2022/23
Permits requiring DNA testing on arrival if contamination or deficient packaging is identified	364	406
Permits requiring mandatory DNA testing on arrival	0	0
Number of facilities inspected by PIO	0	0
Number of facilities desk-audited by PIO	-	34
Number of facilities site-audited by a 3 <sup>rd</sup> party auditor	-	24



Number of ruminant DNA tests performed on plant-based products	0 <sup>9</sup>	4 consignments (45 samples)
Number of positive ruminant DNA tests	0	0

## IMPORTED ANIMAL QUARANTINE AND SURVEILLANCE SCHEME

The Imported Animal Quarantine and Surveillance Scheme (IAQSS) aims to address the risk posed by animals imported from countries with native-born cases of BSE. Cattle imported from countries which have recorded cases of BSE in native-born cattle may have been exposed to the agent that causes BSE before arriving in Australia. These animals that remain alive are prohibited from entering the human or animal food chains in Australia.

National and international risk assessments have been conducted on the risk that the BSE agent infected Australian cattle, with favourable findings. These assessments included significant scrutiny of the risks posed by cattle imported from countries that subsequently reported native-born cases of BSE.

Every (financial) year each state or territory has undertaken surveillance of those cattle identified as being imported. The results of these inspections are compiled into an annual activity report and provided to SAFEMEAT and the AHC.

As of July 2023, there remains just one imported animal (originating from the USA and resident in SA). All other imported cattle from Japan, Canada and the EU are now deceased.

# **COMMUNICATIONS**

The communications strategy is a support component of the program and also addresses one of the program objectives of communicating 'Australia's favourable status for TSEs consistently and efficiently'. The strategy is collaborative in nature and seeks to provide a consolidated, credible platform for all stakeholders to communicate the range of issues associated with the assurance program. The strategy seeks to ensure consistency in terms of the message and its delivery.

The Animal Health Australia website provides a dedicated information centre provided via will provide the basis for a range of tailored initiatives.

The Ruminant Feed Ban (RFB) brochures for manufacturers, retailers and end-users (explaining each sector's responsibilities in relation to RFB legislation) continue to be distributed. The RFB Livestock Producers brochure is linked to in the electronic cattle and

<sup>&</sup>lt;sup>9</sup> The testing undertaken on plant-based material is a microscope analysis for Risk Animal Material, rather than a Ruminant DNA analysis which would be applied to animal feeds containing RAM such as fishmeal.



sheep National Vendor Declarations (eNVD) so all producers using this system are reminded of their obligations under the RFB.

The *Bucks for Brains* brochure for TSE surveillance is distributed to producers and veterinarians by state coordinators, to help promote the NTSESP and the incentives available to help cover the costs of the testing of animals that meet the criteria for the project.

# PROGRAM MANAGEMENT

The TSEFAP is a project based on cooperation and shared commitment to deliver the project objectives, with Animal Health Australia as Project Manager. Sub-projects undertaken, as part of the TSEFAP, will only be progressed with the agreement of the member Parties.

The last financial year saw the National Technical Committee (NTC) meet twice via Teams and the National Advisory Committee (NAC) meet once. The NTC worked on a number of issues out of session over the course of the year. NAC discussion regarding the updated Business Plan continued into 2023/24 due to the timing of the WOAH updates to the BSE Chapter and consideration of the external review of the last five year Business plan period.

All project management plans and national guidelines are reviewed annually by the NTC.

# **FINANCIAL REPORT**

Total TSEFAP expenditure was under budget for 2022-23. Table 10 shows the expenditure for the period covering 2022-23.

**TABLE 10. TSEFAP EXPENDITURE 2022-23** 

Activity	Business Plan Budget	Expenditure
NTSE Surveillance Project	\$920,067	\$308,579
Ruminant feed ban testing	\$9,180	\$5,873
Project management & communications	\$136,659	\$57,414
Total	\$1,065,906	\$371,866

The TSE surveillance expenditure was under half the original Business Plan budget, which was similar to last year and a significant reduction from several years ago when it was over budget by \$51,000. There are likely to be many reasons for this reduction including some impact by COVID-19 movement restrictions. A lack of extension opportunities to promote



the program particularly from 2020-22 may also have produced a legacy issue of fewer people being aware of it. The value of sheep and cattle has also significantly increased in the last couple of years and producers may be opting for testing live animals and treating them, rather than relying on a post-mortem to determine the cause of illness.

The current level of surveillance will be more than adequate to meet our WOAH requirements under the revised system (removal of points target). The financial incentive offered to producers and veterinarians for investigation of clinically-consistent animals was updated (increased) in the 2023-26 Business Plan to retain submissions.

The Ruminant Feed Ban testing component expenditure was close to budget.

Project management and communications expenditure was considerably lower than budgeted. This was considered due to several factors: the annual NTC meeting expenses were lower (no face-to-face meetings), there was no coordinator for part of the year, and the external review cost was lower than expected. The three-year business plan (2023-26) has reduced the budgeted cost for this expense item accordingly.



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