



30 August 2018

Director  
Environmental Biosecurity Section  
Department of the Environment  
GPO Box 787  
CANBERRA ACT 2601  
[exotic.species@environment.gov.au](mailto:exotic.species@environment.gov.au)

Dear Director

### **Re: Importation of Black Tiger Prawns to Australia**

The Queensland Seafood Industry Association (QSLA) understands that an application was lodged by ProAqua Pty Ltd to amend the List of Specimens taken to be Suitable for Live Import (Live Import List) under the *Australia Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to include specific pathogen free (SPF) black tiger prawns *Penaeus monodon* (i.e. giant tiger prawn) for the purposes of prawn aquaculture development.

QSLA holds serious concerns regarding the importation of live animal stock into the country at a time when White Spot Disease (WSD) has impacted the Queensland and Australian prawn industries. The association also understands that proposal specifically intends to:

- Import live *Penaeus monodon* broodstock;
- Sourced from certified disease-free hatcheries in Thailand or Hawaii;
- The prawns would be imported into an Australian quarantine facility (never to leave the facility); and
- The next generation be moved, after testing, to hatcheries and/or farms for grow out as commercial stock.

The association does not support the importation and supports the conclusions identified by the Australian Council of Prawn Fisheries (ACPF) namely:

- Broodstock importation risk should not be reviewed at this time as current disease risk pathways and importation protocols are under review as part of a two year process in the "Review of the biosecurity risks of, and import conditions for, prawns and prawn products" conducted by the Australian Government Department of Agriculture and Water Resources (Animal Biosecurity).
- The historic performance of Australia's biosecurity system to prevent disease introduction has caused extensive damage and lack of confidence amongst the wild sector and is not a sufficient reason to import live animals.
- Until the Australian farmed prawn industry invests significantly in facility biosecurity in the aftermath of 2016 WSD, there is not a strong enough case for introducing animals potentially affected by emerging and undetected disease that might affect the wild.

- The risk of disease infection from external sources into farms is a risk that could bring undone the best plans for specific pathogen-free stock production.
- Given there is no recent precedence for the importation of broodstock for breeding purposes in Australian aquaculture AND there are successful Australian-based aquaculture breeding programs, including history of *P. monodon* domestication and breeding success, there is not a strong enough case for importing broodstock.

Biosecurity is a current key policy concern in Australia and keeping safe our crustacean fisheries with a beach price close to \$1 billion per annum is critical. The importation is not supported by this association.

If you have any questions regarding this correspondence please contact Eric Perez, QSIA CEO on M: 0417 631 353 or E: [eo@qsia.com.au](mailto:eo@qsia.com.au).

Regards,



Keith Harris  
President  
Queensland Seafood Industry Association