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Submission about the Bovine Johne's Disease Framework, with a Special Emphasis on Australia's Goat Industries - November 2015

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My thoughts are this framework would be a very backward step esp. for the goat industry. Goats do not show the severe diarrhoea that is a feature of this disease in cattle. Instead they just suffer from wasting, making Johne's disease easily missed or put down to poor nutrition, worms or other goat diseases that cause wasting, such as CAE or CLA. A recent study of Johne's disease in goats in Saudi Arabia found that the only consistent clinical sign was "weight loss despite apparently normal food intake" in adult goats.ⁱ The visible signs on post-mortem can also easily be missed in goats as was demonstrated in a study in a large US goat herd with a high incidence of Johne's diseaseⁱⁱ where 120 post-mortems were conducted. Johne's disease in goats also occurs in younger animals that is the case with cattle i.e. as early as 12 months.ⁱⁱⁱ Gross post-mortem signs are often difficult to see with the naked eye. A diagnosis would easily be missed unless histology was done.

Key points are:

- Australia has reaped the rewards for past efforts of eradicating diseases such as TB and bovine brucellosis- something countries like NZ and the UK now envy. Australia did this with strong leadership, good education and regulation.
- Other countries are improving their animal health statuses. Japan and Norway are busy with eradication progress. Norway recently eradicated CAE, JD and CLA from their commercial goat herds.
- JD is an animal welfare issue as there is no treatment and vaccination only delays onset, hence prevention is necessary for good animal welfare of all affected species.
- Weakening Australia's Johne's disease controls, weakens the "clean green" image of Australia and its growing reputation for good animal welfare.
- Queensland has a major advantage in having very low incidence of JD, as demonstrated by regular abattoir monitoring of sheep and other surveillance.
- While recognizing that individual producers have suffered financial hardships, these producers can be compensated for the difficulties of being quarantined common good.
- Qld lacks natural barriers (large islands, deserts between agricultural areas etc) that could be used for regional biosecurity plans or prevent spread.
- Climate change will mean more floods and hence soil movements onto properties and therefore the possible spread of Johne's disease onto properties doing the right thing and keeping out JD from other properties upstream not doing anything about their JD.
- Relying on common law will be very expensive for producers to use. Trade practices regulators have been very reluctant to tackle agricultural issues in the past and will also prioritize children's toys over animals.
- This framework does not mention Crohn's disease, despite the long standing suspicions as summarized on this website <http://www.johnes.org/zoonotic/index.html> . There is already a Youtube video from a Crohn's sufferer calling for the ability to buy BJD free animal

products in Australia – see <https://www.youtube.com/watch?v=4CELZLY2X9c> If consumers consider BJD important, they won't wait for scientific proof.

- There is no guarantee that resources removed from the regulation of Johne's disease will be moved to education and adoption of biosecurity. Governments may take the opportunity to get rid of government veterinarians and stock/biosecurity inspectors. Also by not ensuring tracebacks and traceforwards the opportunities will be lost for checking systems and reinforcing the skills of government staff.

My comments on the specific points of the framework are as follows:

9- re the proposed Management Plan for Cattle Production Conditions 2016-21 - goats are often on very small properties and hence have less opportunity for biosecurity buffers than larger commercial properties

11 – I disagree that this new approach should take “the business interest of producers as its cornerstone”- instead improving animal health and welfare should be the cornerstone, along with public health and then business interests.

14 – extension and communication activities have failed before and need the support of regulation to underpin it for those that refuse to do the right thing

23 – common law is very expensive to use and small and hobby goat producers will not have the damages to warrant taking cases to court

31 – goat properties are very scattered and hence less likely to be able to benefit from regional biosecurity plans . Goats uptake of the Market Assurance Program has been very poor and mainly driven by plans to export to Western Australia – currently only 22 are in any stage of the MAP scheme (http://edis.animalhealthaustralia.com.au/public.php?page=mapsearch&aha_program=3)

38- many goats are kept in cities and use small animal veterinarians who may not have the knowledge of Johne's disease required, especially the knowledge about how goats react differently with Johne's disease e.g. no scouring, earlier onset . Also many goat owners ask Facebook groups and other goat owners for goat health advice and are therefore more likely to get very poor advice.

39 – not quarantining in states where this has always happened will spread Johne's disease

41 – while the commercial consequences will vary with the presence of Johne's disease, the animal welfare consequences will be the same i.e. cattle, sheep and goats will have a slow and painful death.

42 – disclosure of Johne's disease needs to be mandatory. Most goat owners will not have the knowledge to ask about Johne's disease and hence if this rule goes ahead, Johne's disease will spread widely in new goat owners

47 – tracebacks and trace forwards needs to be mandatory and not left to the individual owner of the property where Johne's disease has just been identified. Due to the long incubation period, purchasers of animals from a property where Johne's disease has recently been found have a right to know this so they can take steps to prevent spread on their own property. Also these traces are good opportunities for government departments to check their systems and processes for exotic disease outbreaks.

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ⁱ Tharwat, M., F. Al-Sobayil, M. Hashad and S. Buczinski (2012). "Transabdominal ultrasonographic findings in goats with paratuberculosis." *Can Vet J* **53**(10): 1063-1070.

ⁱⁱ Gezon, H. M., H. D. Bither, H. C. Gibbs, E. J. Acker, L. A. Hanson, J. K. Thompson and R. D. Jorgenson (1988). "Identification and control of paratuberculosis in a large goat herd." *Am J Vet Res* **49**(11): 1817-1823.

ⁱⁱⁱⁱ Jones, P. H. (2003). "Paratuberculosis in goats " *Goat Veterinary Society Journal* **19**: 4-10.