

# AUSTRALIA'S QUARANTINE STANDARDS FOR COOKED CHICKEN MEAT FROM THAILAND

BY KRAICHOKE ARUNPAIROJKUL

## FACTS

### Summary of Background on Development of the Quarantine Standard

The issue of Australian quarantine standards for chicken first arose in 1990 when the Australian government began considering the importation of chicken meat from Thailand, Denmark and the United States. In response to domestic concerns about the introduction of Newcastle Disease and Infectious Bursal Disease Virus (IBDV), the Australian Quarantine and Inspection Service (AQIS) began a risk assessment on cooked chicken. It deferred a risk assessment of *uncooked* chicken meat pending completion of the first assessment.

In 1995, AQIS adopted the results of a 1988 study of IBDV conducted at the United Kingdom's Central Veterinary Laboratory as the basis for determining "safe" cooking times and temperatures. The decision met with strong opposition from the Australian Chicken Growers Council who argued that the experiment underestimated the risks associated with commercial cooking processes. For their part, Thai chicken exporters complained that the Australian heat treatment requirements were excessively stringent and commercially impracticable. The requirements would put Thai cooked chicken products at a competitive disadvantage by unnecessarily raising production costs and destroying the nutritional value of cooked meat.

To resolve the issue, AQIS commissioned the Central Veterinary Laboratory to conduct a new test on the heat inactivation of IBDV.

The experiment was completed in 1997. It confirmed that the temperature/time parameters adopted in 1995 readily inactivated Newcastle Disease Virus, but it also found that these parameters would not totally inactivate the strain of IBDV used in the tests. Thus, in November 1997, Australia announced that it would permit imports of cooked chicken meat from Thailand, Denmark and the United States that was processed at core temperature/time parameters between 70°C for 143 minutes and 80°C for 114 minutes. Again the decision met with protest from both Thai chicken exporters and the Australian chicken industry, and AQIS asked the British laboratory to carry out yet another round of tests.

This set of test results, submitted to AQIS in mid-1998, diverged greatly from previous ones. Using different IBDV strains and a different medium for suspending the virus, the new study found that IBDV was unexpectedly resistant to heat inactivation at temperatures lower than 74°C. Based on these new test results, AQIS again revised the minimum core temperatures/time parameters, requiring chicken

meat to be cooked at between 74°C for 125 minutes and 80°C for 125 minutes.

## **BACKGROUND**

Since mid-1980, Thailand, Denmark and the United States have made a number of requests to export both cooked and uncooked chicken meat to Australia. The Australian Quarantine and Inspection Service (AQIS) began considering the proposal to import chicken meat in 1990. However, the Australian Veterinary Association and domestic poultry producers voiced concern over the introduction of Newcastle Disease and Infectious Bursal Disease Virus (IBDV) through the imported meat. Either could pose a great threat to Australia's poultry industry and native bird populations. In response to these concerns, AQIS began an assessment of the risk of importing cooked chicken meat. It deferred assessment of uncooked meat pending completion of the cooked meat assessment.

Although Australia is not now a principal market for Thai chicken products, Thai suppliers could potentially capture 10 percent of the Australian cooked chicken market, worth about 920 million baht (A\$ 40 million), during just the first few years of exports. The Australian poultry market is estimated at 46 billion baht (A\$ 2 billion) annually. Annual consumption of chicken meat is now 27 kg per person compared with the consumption of beef and veal (40.0 kg per person), sheep meat (16.8 kg per person) and pork meat (18.4 kg per person). Based on the present trend, poultry meat could overtake beef and veal as the Australians' most preferred meat within the next ten years. Cooked chicken meat accounts for 20 percent of the market and sales are growing 10 to 20 percent per year. Thailand producers particularly saw potential for sales in Australia to fast food chains such as KFC and McDonald's and big supermarket chains such as Coles, Woolworth and Safeway. The fast food chains may be interested in sourcing cheap precooked chicken meat from Thailand, while supermarkets may be interested in importing Thai chicken products to satisfy their lower-income customers.

In 1998 the United States was the world's largest exporter of poultry meat followed by the European Union (where France accounts for 60% of the exports and the Netherlands, 25%) and Brazil. Thailand is the largest net exporter in Asia. China and Hong export more than Thailand, but they also import more than they export. (See table in Appendix)

Infectious Bursal Disease is important from an economic viewpoint because it could cause huge losses for chicken producers. IBDV is highly contagious and remains infectious for several months in the poultry house environment. To eradicate the virus, a poultry house requires effective cleansing and disinfecting. IBDV is most prevalent in Southeast Asia, Europe and North America; the Office International des Epizooties (OIE) 1997 yearbook reported cases of the disease in Australia. The proposed cooking regime does not apply to domestically processed chicken products on the grounds that the country is free from IBDV.

In mid-1995, the Australian government decided "in-principle" to allow imports of cooked chicken that had been processed under specified temperature/time parameters proven to inactivate the disease viruses. To determine these specific parameters, AQIS considered a range of studies and then adopted a 1988 study of IBDV conducted by Dr. Dennis Alexander of the Central Veterinary Laboratory in the UK. This study, commissioned by General Foods poultry, New Zealand, recommended 70°C for 90 minutes and 80°C for 14.4 minutes for the inactivation of IBDV.

In 1996, AQIS published a draft protocol that set out core temperature/time levels for processing chicken meat:

- 70°C for 95 minutes or
- 72°C for 65 minutes or
- 74°C for 44 minutes or
- 76°C for 30 minutes or
- 78°C for 21 minutes or
- 80°C for 15 minutes

In reaction to AQIS's draft protocol, the Australian Chicken Growers Council argued that AQIS's risk assessment underestimated the risks associated with commercial cooking processes. For their part, Thai chicken exporters complained that the cooking regime proposed by the Australian government was commercially impracticable. The specified temperature/time parameters would not only unnecessarily raise production costs, but also would affect the quality of the cooked meat, thereby reducing the competitiveness of their products in the Australian market.

The issue was brought up for discussion in the Thai-Australian Joint Commission. Subsequently, in early 1997, the Australian government commissioned its own test by the Central Veterinary Laboratory.

In April 1997, a delegation from AQIS and the Australian poultry industry was sent to inspect four Thai processing facilities that had applied for the sanitary certification required for exporting to Australia. None of the facilities met the Australian sanitary requirements; all were told that they needed to improve their slaughter and processing facilities. Australia regulations provide that *The Australian Standard for Hygienic Production of Poultry Meat for Human Consumption* will be used as a guide in the assessment of slaughter and processing establishments for approval to process product for export to Australia. The *AQIS Code of Hygienic Practice for the Production of Heat Treated Refrigerated Foods Packaged for Extended Shelf Life* will be used as a guide in evaluating the processing and handling of product for export to Australia.

In July 1997, amid mounting protest from domestic poultry producers, the Australian government delayed a decision to open its poultry market to foreign imports until the Central Veterinary Laboratory completed its second trial and submitted the results to AQIS.

In September 1997, Thailand threatened to boycott US\$ 1.2 billion dairy and meat exports from Australia in retaliation for a continued ban on cooked chicken meat imports. The Australian Dairy Industry Council called on the Australian government to abide by the WTO's rules on non-tariff barriers and to lift quarantine barriers on

imports of cooked chicken meat to escape the boycott. National Party leader Tim Fischer suggested the Australian government place a tariff on imported cooked chicken meat as a transitional arrangement, which WTO provisions allow.

On 7 November 1997, the Australian government announced a decision to allow imports of cooked chicken meat from Denmark, the United States and Thailand processed under the following core temperature/time parameters:

- 70°C for 143 minutes or
- 72°C for 137 minutes or
- 74°C for 131 minutes or
- 76°C for 125 minutes or
- 78°C for 119.5 minutes or
- 80°C for 114 minutes

The parameters were based on the Central Veterinary Laboratory's new test results, which confirmed that the existing temperature/time parameters readily inactivated Newcastle Disease Virus but would not totally inactivate the strain of IBDV used in the tests.

But protests continued from both Thai chicken exporters and the Australian chicken industry, and AQIS asked the Central Veterinary Laboratory to carry out yet another round of tests. The test results, submitted to AQIS in mid 1998, indicated that IBDV was unexpectedly resistant to heat inactivation at temperatures lower than 74°C. These test results differed from the previous study because in the second test Central Veterinary Laboratory used different virus strains and a different medium for suspending the virus. Based on these new test results, Australia announced in June 1998 a revision of the minimum core temperatures/time parameters as follows:

- 74°C for 165 minutes or
- 75°C for 158 minutes or
- 76°C for 152 minutes or
- 77°C for 145 minutes or
- 78°C for 138 minutes or
- 79°C for 132 minutes or
- 80°C for 125 minutes

Australia notified the WTO on June 17, 1998 that it intended to put the new standards in effect on August 10, 1998. (See Appendix for the WTO notification G/SPS/N/AUS/72). In response to this notification, Thailand submitted a statement that questioned the need for the stringent requirements imposed by Australia. Thailand noted that the data on which the standard was based was not realistic. The most likely strain of the IBDV virus can be deactivated at much lower temperatures than the regulations required and it was extremely unlikely that birds infected with the more virulent strain of the virus could be exported since they would die before being slaughtered. The Australian standard also does not take into account the preventive measures that can be taken in exporting countries. Thailand said that if there is to be a new standard, it should be set by Office International des Epizooties (OIE), (Thailand's complete comments are attached in the Appendix.) At the September 15-16, 1998 meeting of the WTO Committee on Sanitary and Phytosanitary Measures,

the European Communities said that the Australian standard was more restrictive than necessary. (See Appendix for WTO document **G/SPS/GEN/96, 25 September 1998.**) The United States in its 1998 report on foreign trade barriers, National Trade Estimates report, said that:

The Government of Australia limits livestock and poultry imports through quarantine and health restrictions. For some of these, the Australian Government has not completed a risk assessment that would provide the WTO-required scientific basis for imposing such restrictions. The Federal Government decided to lift the ban on cooked chicken imports from the U.S., Denmark and Thailand. The United States believes the recommended temperature/time requirements applicable to the treatment of processed cooked poultry meat are so extreme as to discourage imports.

At a meeting in September 1998, the Thai National Sanitary and Phytosanitary Committee instructed the Livestock Department of the Ministry of Agriculture and Cooperatives to conduct its own risk assessment of possible IBDV-contamination in the production of cooked chicken. The assessment is now underway and is expected to be completed in April 1999. It is designed to account for IBDV prevention programs at the farm level; incidence of IBDV infection in Thailand; risk management for transporting chickens from poultry farms to slaughter houses; and quality assurance programs used by Thai chicken processing plants, including heat treatment, packaging, and shipment methods for cooked products. AQIS and the Central Veterinary Laboratory arbitrarily assumed that the CS88 strain of IBDV, the very virulent strain, was prevalent in Thailand although so far, no research has been done to identify which IBDV strains exist in Thailand.

The heat inactivation measures recommended by the AQUIS are not the only ways to deal with IBDV. According to Professor Daral Jackwood, an Ohio State University expert on IBDV, the disease control used most often is vaccination of breeder flocks. Using this method, maternal antibodies are transferred to chicks and thereby protect the chicks for the first two critical weeks of life, a time when infection by IBDV causes the most immune suppression. Another study conducted by the University of Florida's Institute of Food and Agricultural Science also confirms that protection of chickens from IBDV can be achieved through a breeder vaccination program, supplemented by effective biosecurity measures (control of people, equipment and vehicles on the farm) and an effective broiler vaccination program. Moreover, regular ante-mortem and post-mortem inspection at the farm level can ensure that each batch of source birds is in good health before being transported to slaughterhouses.

At the processing stage, a one week quarantine is sufficient to ensure that the birds are IBDV-free because chickens infected with IBDV will normally die within 4-5 days. Cooked chicken meat destined for Australia may even be separately processed and stored. Quality assurance programs such as HACCP introduced by Thai processing plants should also prevent exposure of cooked products to possible recontamination.

The Ministry of Foreign Affairs, in coordination with the Ministry of Commerce and the Ministry of Agriculture and Cooperatives' Department of Livestock, has led the Thai government's effort to address the Australia's restrictions on chicken imports. Since Australia is a relatively small market in comparison to other major markets such as Japan and the EU, the issue has not been placed high on either Thai or Australian government agendas. The Ministry of Foreign Affairs, which is charged with

promoting Thailand's relations with foreign countries, certainly does not want to see bilateral relationships between Thailand and Australia soured by this single issue. The Ministry of Commerce currently is exploring market opportunities in Australia for other agricultural products, and the Ministry of Agriculture and Cooperatives is now implementing a Thai-Australian MOU on agricultural cooperation (signed during the Australian Prime Minister's official visit in April, 1998). Australia extended A\$160 million in aid to Thailand during the 1997 financial crisis.

The Broiler Processing Exporters Association is exploring the possibility of asking the Thai government to impose a selective boycott on some of Australian diary and meat exports to Thailand or to delay importation of lupin seeds and skim milk. An expanded overseas market means an increase in demand for chickens to be processed for exports. The Association has also heard of reported cases of Blue Tongue disease in Australia, an animal disease that is exotic to Thailand, and is considering whether that might be a grounds for restricting Australian beef imports. Animal feed companies will benefit indirectly from increased exports; they can expect their sales to increase as a result of growing demand for feed grains from chicken growers. Thai Chicken Growers Association represents the producers and the Thai Feed Mill Association represents the animal feed companies. The Board of Trade of Thailand is represented on several governmental committees. It acts as the voice of business, pointing out concerns and offering opinions and recommendations on behalf of the private sector to the government. The Australian-Thai Chamber of Commerce will not want to see commercial relations between Bangkok and Canberra strained as a result of any failure of the Thai and Australian governments to settle this problem.

The Board of Trade of Thailand acts as the voice of business, pointing out concerns and offering opinions and recommendations on behalf of the private sector to the government. The Board is represented on several governmental committees. The Australian-Thai Chamber of Commerce seeks to maintain good commercial relations between Bangkok and Canberra and does not want the Thai and Australian governments' failure to settle a problem to strain relations.

In Australia the Australian Chicken Growers Council (ACGC), with the supported of the Australian Veterinary Association (AVA), has actively lobbied against proposals to import foreign chicken meat on the grounds that there is a high risk of importing Newcastle Disease and IBDV into the country. The process of import risk analysis carried out by AQIS, although based on scientific procedures, also allowed participation by stakeholders, including the industry concerned. The scientific process has been susceptible to pressure particularly from ACGC.

The Australian Chicken Meat Federation, which represents major chicken meat processors, has not been active in the lobby against chicken meat imports. Some of the Federation's members have been increasing their capacity and may even be looking to export opportunities. Imports of chicken meat will help assure a good, inexpensive supply of meat crucial to producing an internationally competitive product.

The final decision on quarantine will be made by AQIS. The Department of Foreign Affairs and Trade (DFAT) can influence the decision-making process to some extent. DFAT is in charge of ensuring that Australia's trade policy is in line with its WTO

commitments. Deputy Prime Minister and Minister for Trade Tim Fischer, leader of the National Party, was fully aware that Australia could not resist the global liberalization trend when he suggested that his country introduce appropriate safeguard actions such as a tariff or quota restriction on foreign chicken imports on a temporary and reducing basis. It is unclear whether he can gain support from other party members for this cause because his party has a constituency in rural Australia.

The Australian government may need to provide adjustment assistance to help the domestic chicken industry to adjust to the change in market conditions that chicken meat imports will bring. It may also look at export opportunities as an alternative way to help the industry. In either case, the government has to work hard and closely with the industry to help domestic producers become more competitive. According to an international benchmarking study in 1997, Australia lags behind other major chicken producers both in terms of price competitiveness and efficiency.

Australia's quarantine policy also affects other major poultry exporters, including the EU (especially France and Denmark), the US and Brazil. The USA Poultry and Egg Export Council and the Danish Poultry Exporters Association are two groups that advise their government's on issues affecting their exports. Denmark is also a strong free-trade supporter as well as a chicken exporter.

The Bangkok Post and the following newspapers in Australia may have an interest in the story: The Australian, The Sydney Morning Herald and the Daily Telegraph in New South Wales, **The** Age and the Herald Sun in Victoria, The Courier-Mail in Queensland, The Advertiser in South Australia, The Times in Western Australia, The Mercury in Tasmania, Alice Spring News in North Territory and The Canberra Times in Canberra.

## APPENDIX



AUSTRALIAN QUARANTINE AND INSPECTION SERVICE  
DEPARTMENT OF PRIMARY INDUSTRIES AND ENERGY



File No:98/201  
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August 1998

### **QUARANTINE REQUIREMENTS FOR THE IMPORTATION OF COOKED CHICKEN MEAT**

#### **1. DOCUMENTATION**

- a. A permit, in writing, to import de-boned cooked chicken meat/meat products<sup>1</sup> (herein referred to as cooked chicken meat) into Australia must be obtained by the Australian importer from the Director of Animal and Plant Quarantine (Australia) (herein called the Director) prior to the product first being imported.
- b. Each application for permission to import must include the following details:
  - country of export
  - name of the exporting and importing companies
  - name, address and identification/veterinary control number of the processing establishment
  - country of origin of raw materials
  - product type and name
  - full details of any process of manufacture the meat has been subjected to including core temperature/time treatment processes, packaging and labelling and post-processing quality control.
- c. Each application will be assessed on the above criteria as well as any other criterion which is considered relevant by the Director.
- d. Product type exported must correspond exactly to approved product.

#### **2. REQUIREMENTS**

- a. Certification accompanying each consignment must be endorsed by an official veterinarian in accordance with the current "Quarantine Requirements for the

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<sup>1</sup> Chicken meat is defined as any part of a chicken, being a part that is intended or able to be consumed as human food, but does not include bone or fat not attached to the tissues of the chicken from which it was derived. Chicken meat product refers to chicken meat with the addition of other ingredients of animal or plant origin.

Importation of Cooked Chicken Meat" and will require on arrival, a "Quarantine Entry".

- b. Only de-boned cooked chicken meat is permitted for importation.
- c. The chickens from which the cooked chicken meat/meat products are produced must be clinically healthy and must originate from the country of export of the cooked chicken meat/meat products.
- d. The chickens must be slaughtered and the meat processed in establishments currently approved by the Director. The standard of construction and facilities of slaughter and processing establishments must be equivalent to those found in Australian establishments. Product must be processed and handled in an hygienic manner and in accordance with good manufacturing practices as applied in Australia. AQIS may take into account existing approvals granted by competent veterinary authorities of foreign countries.

Note: The *Australian Standard for Hygienic Production of Poultry Meat for Human Consumption* will be used as a guide in the assessment of slaughter and processing establishments for approval to process product for export to Australia. The *AQIS Code of Hygienic Practice for the Production of Heat Treated Refrigerated Foods Packaged for Extended Shelf Life* will be used as a guide in evaluating the processing and handling of product for export to Australia.

- e. Officials of the veterinary authority of the country of export must be present in plants at all times when slaughtering chickens and processing cooked chicken meat for export to Australia.
- f. Chicken meat for export to Australia must be processed and stored separately from all other meat products.
- g. Access of workers in raw meat areas to unpackaged cooked product shall be prevented by physical means.
- h. Processing equipment (cookers, ovens etc) shall be equipped with an AQIS-approved system for recording the cooking time and core temperature of the product. Such records shall be maintained for all consignments for export to Australia for at least two years and be made available to AQIS on request.
- i. While preparing product for Australia, establishments must conduct slaughter and processing operations in accordance with quality assurance principles and shall have a HACCP program in place.
- j. All ingredients of animal or plant origin present in product for export to Australia shall comply with AQIS quarantine and other Australian requirements.

Note: Imported cooked chicken meat must comply with the *Imported Food Control Act 1992* and the Australian Food Standards Code under the *National Food*

*Authority Act 1991*. Under this legislation, AQIS may inspect, sample, hold and test imported cooked chicken meat for microbial agents or residues of public health concern. Additional requirements regarding labelling, packaging and food composition standards must also be complied with. Information on the Australian Food Standards Code may be obtained from the Australia New Zealand Food Authority.

- k. The cooked chicken meat/meat products shall be imported in containers which are sealed with numbered official seals.

### **3. SANITARY CERTIFICATION**

3.1 Each consignment must be accompanied by a Sanitary Certificate in accordance with the Office International des Epizooties (OIE) International Animal Health Code Model Certificate No. 4. signed by an Official Veterinarian. The certificate must be in English and must provide details of:

- the packaging of the meat including details of the labelling,
- the addresses and veterinary approval numbers of establishments at which the animals from which the meat was derived were slaughtered, the cutting-up establishment at which it was prepared, the establishment at which it was processed and the establishment at which it was stored prior to export,
- the names and addresses of the exporter and the consignee.

3.2 The Official Veterinarian must certify in English, in addition to requirements under part IV of OIE Model certificate No.4 Attestation of Wholesomeness, that the following requirements are met:

- (i) the cooked chicken meat/meat product was de-boned and derived from clinically healthy birds which originated in the country of export and from a flock in which Newcastle disease, avian influenza or fowl cholera was not reported. The birds passed ante-mortem and post-mortem inspection under official veterinary supervision;
- (ii) establishment(s) where the chickens were slaughtered and the meat was processed and stored must have current AQIS approval and meet AQIS requirements for facilities and hygienic operation;

Note: The name, address and veterinary control number of each plant must be specified;

- (iii) where poultry/meat which is ineligible for export to Australia is slaughtered/processed in an establishment which also slaughters/processes chickens/ meat, for export to Australia, the poultry/meat for export to Australia was slaughtered/processed before the ineligible products, and following thorough cleaning and sanitising at the end of the previous day's operations;
- (iv) Access of workers in raw meat areas to unpackaged cooked product was prevented by physical means;

- (v) the chicken meat/meat product was heated at the following core temperature/  
time;
- 74°C for 165 minutes or
  - 75°C for 158 minutes or
  - 76 °Cfor 152 minutes or
  - 77°C for 145 minutes or
  - 78 °C for 138minutes or
  - 79°C for 132 minutes or
  - 80 °C for 125 minutes

Note: The temperature/time parameter used must be specified;

- (vi) the temperature recording equipment was checked during the cooking process and was found to be in good order. Records confirm that the time/temperature parameters specified in (iv) were achieved;
- (vii) the cooked chicken meat/meat product complies with relevant national standards of the exporting country for control of residues and microbial agents of public health concern in food;
- (viii) the cooked chicken meat/meat product for Australia was processed separately and physically separated during storage from other products;
- (ix) the cooked chicken meat/meat product was packed on ---- (date), in clean, new packaging in a manner which prevented contamination;
- (x) the identification number(s) of the processing and packing establishment(s) is readily visible on the package or wrapping containing the cooked chicken meat/meat product in such a way that the numbers cannot readily be removed without damage to the package or wrapping;
- (xi) the cooked chicken meat/meat product is to be shipped in a clean container, bearing official seal(s) of which are intact at the time of export. This container does not contain any meat which is not eligible for export to Australia.

#### **4. VERIFICATION**

AQIS will maintain appropriate systems to verify these requirements will be complied with on an ongoing basis. Elements of this system will include:

- (1) An authorised quarantine officer will conduct a visual inspection of the product and documentation on arrival in Australia;
- (2) Inspection and detention of consignments and sampling/analysis of samples may be performed under the Imported Food Inspection Program (IFIP);
- (3) At the discretion of the Director, premises producing cooked chicken meat/meat product for export to Australia may be inspected/audited as to all aspects of compliance with these requirements.

#### **5. REVIEW**

Conditions for importation may be reviewed at any time at the discretion of the Director.

SARAH KAHN  
Assistant Director  
Animal Quarantine Policy Branch

**WORLD TRADE  
ORGANIZATION**

**G/SPS/N/AUS/72**  
17 June 1998

(98-2450)

**Committee on Sanitary and Phytosanitary Measures**

**NOTIFICATION**

<b>1. Member to Agreement notifying:</b> <u>AUSTRALIA</u> <b>If applicable, name of local government involved:</b>
<b>2. Agency responsible:</b> Australian Quarantine and Inspection Service
<b>3. Products covered (tariff item number(s) as specified in national schedules deposited with the WTO. ICS numbers may be provided in addition, where applicable):</b> Cooked chicken meat
<b>4. Title and number of pages of the notified document:</b> Finalization of conditions for cooked chicken meat (8 pages).
<b>5. Description of content:</b> Quarantine Requirements for the importation of cooked chicken meat: Documentation Requirements Sanitary certification Verification Review
<b>6. Objective and rationale:</b> To provide final conditions for the importation of cooked chicken meat.
<b>7. An international standard, guideline or recommendation does not exist [ X ]. If an international standard, guideline or recommendation exists, whenever possible, identify deviations:</b>
<b>8. Relevant documents and language(s) in which these are available:</b> English
<b>9. Proposed date of adoption:</b> 10 August 1998

<b>10. Proposed date of entry into force:</b> 10 August 1998
<b>11. Final date for comments:</b> 7 August 1998 <b>Agency or authority designated to handle comments:</b>
<b>12. Texts available from:</b> National enquiry point [ X ] or address, telefax number and E-mail address (if available) of other body:

# WORLD TRADE ORGANIZATION

G/SPS/GEN/96  
25 September 1998

(98-3723)

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Committee on Sanitary and Phytosanitary Measures

Original: English

## AUSTRALIAN QUARANTINE REQUIREMENTS FOR THE IMPORTATION OF COOKED CHICKEN MEAT (G/SPS/N/AUS/72)

Statement made by the European Communities  
at the Meeting of 15-16 September 1998

### GENERAL REMARKS

The European Communities consider the recommended temperature/time requirements applicable to the treatment of processed cooked poultry meat are so extreme as to create unnecessary barriers to trade.

A thorough examination of available scientific data led the European Communities to the conclusion that the Australian requirements are more restrictive than required in order to protect animal life and health, are not based on scientific grounds and are not justifiable.

Australia indicates that chicken meat must come from clinically healthy birds which originate in the country of export and from a flock in which Newcastle Disease, avian influenza and fowl cholera has not been reported. If the country of origin is in a position to meet such a requirement the time/temperature treatments would be unnecessary and burdensome.

In the light of the above and in consideration of Article 5.8 of the SPS Agreement, we would appreciate receiving the complete risk assessment carried out by Australia in support of such a stringent measure.

Australia claims that standards of construction and facilities of slaughter and processing establishments must be equivalent to those found in Australian establishments. It is therefore our understanding that each country wishing to export will have to engage in equivalency discussions with Australia to reach a definition of equivalence of the respective systems and until an agreement has been reached trade may not take place, no matter what guarantees are given by the exporting country. We would like a clarification of the above.

### SPECIFIC QUESTIONS IN RESPECT OF THE FOLLOWING PARAGRAPHS OF THE NOTIFICATION

- 1.c. How may exporters know in advance whether or not they have met all Australian requirements, when the Director of AQIS may impose "any other" conditions of import?
- 1.d. How is an exporter to know what is an "approved product"?

- 2.b. Why is only de-boned chicken allowed?
- 2.c. Does "country of import" cover the whole European Communities or only individual member States?
- 2.d. How is the approval of the Director obtained?
- What information is available to exporters to judge "equivalence" with standards "found" in Australian establishments? Are inspection or audit reports of Australian establishments available?
- 2.e. Are officials of the Australian veterinary authority present at all times in Australian establishments when slaughtering chickens and processing cooked chickens for the Australian market?
- 2.g. What is meant by "physical means"? A single rail? A wall? Locked doors?
- 2.h. What is an "AQIS-approved" time and temperature recording system? Does AQIS recognize approvals by other competent authorities as equivalent? If not, why not?
- 2.i. What are "quality assurance principles"? Are these international standards? If so, which?
- 3.2. (i) See query under 2.c. re "country of export". Is ante-mortem and post-mortem inspection under official veterinary supervision performed on all chickens slaughtered in Australia for domestic consumption?
- (iii) Why is this separation necessary in cases where the same hygiene standards prevail, even if some of the poultry is ineligible for export to Australia for reasons unconnected with health?
- (iv) See comment under 2.g.
- (v) What is the justification for these time and temperature requirements? Is chicken cooked to this extent acceptable to Australian consumers?
- (vi) How is temperature-recording equipment to be checked during the cooking process?
- (vii) Does this mean that samples for residue testing must be taken from each consignment for export to Australia? Must they be tested for the presence of residues which are not forbidden in Australia? What microbial standards are required for Australian chicken produced for the domestic market?
- (viii) See question under (iii). What is meant by "physically separated" during storage?

(xi) Why should a container not contain product ineligible for Australia but intended for another destination?

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**AUSTRALIA'S QUARANTINE REQUIREMENTS  
FOR THE IMPORTATION OF COOKED  
CHICKEN MEAT (G/SPS/N/AUS/72)**

Submission by Thailand

Australia's quarantine requirements for the importation of cooked chicken meat have caused grave concern to Thailand. There are reasons to believe that the proposed core temperature/time treatment, specified in sub-clause 3.2(v) of the document, is beyond the extent necessary to protect human or animal life or health. Though the proposed requirements are based on scientific principles, they appear to constitute a disguised restriction on international trade.

The above comment is based on the following justifications:

(a) Faulty interpretation of the scientific data bases

Although Australia claimed that their proposed requirements were based on scientific data, which had been studied by Dr. D.J. Alexander from the Central Veterinary Laboratory (CVL) at Weybridge, United Kingdom, on behalf of the Australian Government, *such data cannot represent or reflect the reality of Infectious Bursal Disease (IBD) infection in all cases.*

Several scientific research works on IBD with various degrees of virulent virus strains have been published world-wide. The results of these studies were consistent with each other both on the dissemination of IBD virus through the tissues of chicken and the heat inactivation of the virus. According to the studies, IBD virus is unable to be detected in tissues and organs beyond 14 days post infection (references 1, 2, 3, 4). The virus can also be inactivated at 80°C in 10-15 minutes (references 5, 6, 7, 8)

In Dr. Alexander's previous experiment using IBD virus strain 52/70, *infected bursa homogenates* with different degrees of heat treatments, the virus was inactivated by heating at 70°C for 60 minutes, 75°C for 45 minutes and 80°C for 10 minutes (Chettle and Alexander, unpublished data). Dr. Alexander further recommended an appropriate temperature/time of heating at 100°C for 1 minute as that of Newcastle disease virus. It might be argued that Alexander's bursa homogenates contained very high titres of virus, and that bursal tissue is unlikely to be included in chicken meat products.

In Dr. Alexander's 1997 experiment using IBD virus strain CS88 *tissue homogenates*, the IBD virus survived at high temperatures for an unexpectedly long period of time, i.e. 70°C in 300 minutes and 80°C for 90 minutes. When comparing both experiments, the earlier work was undertaken on a clarified aqueous suspension of the virus, while his latest study used an unclarified suspension of infected tissues. After heating for periods of 60 minutes at 70°C

and 15 minutes at 80°C, the particulate matter in the suspension became coagulated, which may have protected the virus to at least some extent. Moreover, the titre of virus in the homogenate used in this study was more than  $1 \times 10^{22}$  higher than in the previous one. That experiment was conducted by using the 52/70 strain of virus which has a lower virulence than the CS88 strain used in this study.

In natural infection caused by highly virulent IBD virus such as strain CS88, the mortality rate of birds in infected flocks would be high (90 per cent) within a few days. Should there be a serious evidence of such critical infection, these contaminated birds would be prohibited for exportation and local consumption, since only healthy birds would be permitted to enter the approved slaughterhouses. All poultry farms licensed for exportation are obliged to report their raising program/plan to the Department of Livestock Development (DLD) regularly in advance. DLD's veterinary authorities assigned to specific approved poultry slaughterhouses conduct routine inspection of documents produced by the original farms accompanying the poultry to the slaughterhouses. Records of raising details starting from day-old chicks to the last day at the farms must be provided in the documents. The information also includes number of chicks entered, number of deaths, causes of death, etc. On the assumption that there is an outbreak of any serious infectious disease, such as highly virulent IBD, poultry raised in the infected farm shall be embargoed up to the time that any unclear cause is known.

#### Overlooking the effective preventive measures of the exporting countries

As mentioned elsewhere, the flocks infected by highly virulent IBD virus strains such as CS88 would have high mortality rates of 90 per cent (Chettle et al 1989, Vet Rec 125:271-272) within a few days (reference 9). IBD virus replication initiates in gut-associated macrophages and lymphoid cells within 4-5 hours after infection (reference 10). From there, virus spreads via the portal vein and main bloodstream to various organs and tissues especially the bursa, the target organ for IBD virus. Virus cannot be detected in blood after 72 hours post infection and in bursa after 14 days post infection (reference 1). With the occurrence of circulating IBD antibodies, IBD virus can be rapidly eliminated. Muscle is not a target organ for IBD virus. That is a reason why the virus is rarely found in muscle. Dr. D.J. Alexander's latest research demonstrated that the IBD virus strain CS88 was detected in all samples, except skeletal muscle in which virus was not found at 24 hours. He concluded that IBD virus is widely disseminated throughout the tissues and organs of chickens in at least 96 hours after infection by a highly virulent strain of the virus (CS88). However, he did not report the results of testing beyond 96 hours. Definitely, all chickens must already be dead. He did not use only highly virulent virus strains in his studies but also very high titres of virus in the homogenates. The studies of Edgar and Cho in 1976 demonstrated persistence of virus from 24 hours to 21 days post infection. This finding proves that the outbreaks caused by highly virulent strains will lead to higher mortality rates than that of lower virulent ones. Beyond the 14<sup>th</sup> day of post infection virus can be rapidly eliminated.

If the chicken is derived from the source flocks for the proposed export of chicken meat preparations, where effective preventive measures for all infectious poultry diseases of concern (including IBD) are undertaken, the risk of having IBD contaminated chicken is extremely low.

#### Constitution of too specific standards which are theoretically possible but practically impossible

Australia's proposed core temperature and time requirements for cooked chicken meat and meat products at 74°C in 165 minutes or 80°C in 125 minutes, are not viable for commercial manufacturing. High temperature and time requirements would result in an unacceptable texture and appearance of the products. The requirements would also increase the production

cost burden of producers and would thus adversely effect competitiveness of foreign products. These measures would lead to discrimination and unfair trade practices.

Demand from Thailand for OIE to establish a new reliable scientifically-based standard on IBD for the facilitation of international trade

The Office international des épizooties (OIE), being recognized by the WTO as a relevant body for the establishment of standards with scientific-based principles that would promote a transparent and safe system for international trade of animals and animal products, has set up the International Animal Health Code (mammals, birds and bees) for member countries.

According to the Code, IBD is a disease classified in List B. This is the list of diseases which do not pose a potential threat for serious contamination and rapid spread of animal disease nor a major cause of impediments to international trade such as those contained in List A.

If it is agreed that additional standards and requirements for chicken meat and meat products are further required, OIE should be the sole body to conduct research and studies necessary to establish a set of proper heat treatments for such commodities. The research protocol and interpretation should be transparent in order to facilitate member states to conduct their international trade.

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