



Animal Biosecurity Branch

Biosecurity Animal Division

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Draft Biosecurity Import Risk Review – Importation of live garden snails (*Cornu Aspersum*) for heliculture

Dear Animal Biosecurity Branch,

AMIC appreciates the opportunity to provide feedback into the draft biosecurity import risk review for the importation of live garden snails for heliculture.

The Import Risk Review acknowledges this risks of imported live garden snails ending up in the wild. The report states *“There is a significant likelihood that snails imported into Australia and released to commercial snail farms in Australia will enter the broader Australian environment, so hazards of concern must be effectively managed prior to that point”*.

AMIC holds concerns relating to imported snails entering the broader environment and what unintended and unforeseen impacts that may have on the natural environment and existing agricultural production sectors. AMIC also holds concerns around the potential for imported snails to serve as an intermediate host for a number of parasites that could impact a number of agricultural industries and livestock sectors.

AMIC would urge the Department of Agriculture, Fisheries, and Forestry's Biosecurity Animal Division to deeply consider and make a public assessment on what these impacts could be and how existing agricultural industries, and the natural environment, might be impacted by the introduction of imported snails.

We are concerned that progression of this import pathway for a niche, developing industry would unreasonably create significant known and unknown risks or impacts to the Australia horticulture and livestock industries which provide food security, jobs, and economic growth to regional communities. On balance, we do not see that these risks associated with an introduced biological species are commensurate with the potential advantages, namely the development of the domestic snail industry, when other pathways are available.

AMIC would advise the government to support the domestic snail industry in investigating other avenues for achieving the desired snail type, prior to importing an introduced species that could have unknown impacts on the broader Australian environment. Specifically, the lifecycle of a snail is only short, as such AMIC would suggest that changes to the size of snails with selective breeding would not be a significant time investment. Other established Australian agricultural industries, including livestock, have had to do similar as the importation of biological materials was not viable due to importation bans or other regulations that made it extremely difficult to import from overseas.

The report notes – “The applicants wish to use imported snails as a base to breed from, rather than ‘spending years developing snails of a suitable size from domestic stock’.” However, the first application for the importation of these snails occurred in June 2020 meaning that the industry could have undertaken 4 years of selective breeding to date. *C. Aspersum* in artificial conditions generally take 10-12 months to become mature, producing one generation per year.

AMIC understands that an issue faced by the existing domestic snail industry in Australia is that not all snails that are bred and raised reach a marketable size. We understand that the industry would be trying to diminish this issue by importing larger snails to use as a breeding stock to reduce product that is used in pet food manufacturing or similar due to their unmarketable size. However, AMIC stresses that all agricultural industries face waste product and market specification challenges and that the importation of live snails from overseas should not be the immediate solution to this without proper environmental and potential knock-on impacts to other industries clearly identified.

Whilst the scientific evidence provided in the report suggests that *C. Aspersum maximum* is very similar to the endemic subspecies that we already have in Australia and suggests that the impact will be commensurate with that of existing species, the exact biological differences between the two are not wholly known. Whilst the report notes similar biology between the two, and that the larger species has not become a pest in other countries where it has been introduced, it has not been introduced into a climate which is the same as Australia and its survivability in this climate is untested.

The introduction of *D. Dendriticum* (Lancet liver fluke) to Australia could have adverse consequences for the agriculture industry. As seen in Iran, it is possible that infection could slow development, and impair fertility in livestock, which can reduce product quality and rate of production. It could also increase costs associated with anthelmintic treatments and costs of stock replacements. There is a lack of clinical symptoms in grazing animals which makes the presence of this parasite particularly hard to identify and management. Additionally, two intermediate snail hosts are already widespread in Australia (*C. virgata* and *C. acuta*), therefore there are already suitable intermediate hosts present within Australia for *D. Dendriticum*.

Overall, AMIC is of the position that the risks and potential impacts to existing agricultural industries of the importation of live garden snails is not commensurate with the benefits for a developing industry that has other pathways for development. We suggest more work is required of DAFF to determine these potential impacts to the environment and existing sectors before anything should be imported – particularly noting the high likelihood of integration into the wild. AMIC would draw the Department’s attention to previous biological importations that have escaped biological control and become a major pest in Australia – namely, the Cane Toad, as an example of the potential for significant negative unintended consequences.

While AMIC assesses the science provided in the review as sound, a number of risks remain unknown, under-considered and under-identified. The livelihood of Australia and the Australian economy is reliant on the livestock sector and the impact of impaired fertility and reduction of quality and rate of production are not inconsequential impacts should the importation of live snails contribute to these issues.

Regards,

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