REVIEW OF SUBMISSIONS ON:

DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW
ZEALAND OF FROZEN CANINE SEMEN FROM AUSTRALIA

MAF Biosecurity New Zealand
Ministry of Agriculture and Forestry
Wellington
New Zealand

1 May 2008

Import Standards Group
MAF Biosecurity New Zealand
REVIEW OF SUBMISSIONS ON:

DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW ZEALAND OF FROZEN CANINE SEMEN FROM AUSTRALIA

1 May 2008

Approved for general release

Clive Gower-Collins
Import Standards Group Manager
Biosecurity New Zealand
INTRODUCTION

The draft import health standard for the importation into New Zealand of frozen canine semen from specified countries was notified on the MAF Biosecurity New Zealand website on

MAF received submissions from the following:

<table>
<thead>
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<th>Name</th>
<th>Date</th>
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<tr>
<td>Robyn Martin, General Manager</td>
<td>10/10/2007</td>
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<td>Biosecurity Australia</td>
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<tr>
<td>Dr Kirsten Roberts</td>
<td>17/10/2007</td>
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<td>Veterinarian</td>
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<td>Total Vet Services</td>
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This document summarises the issues raised in the submissions, and presents the MAF response to each.
SUBMISSIONS

1  Biosecurity Australia

1.1  PART B Importation procedure point 5
New Zealand has removed clauses PART B, point 5.2 and PART D, VI, points 2.1 and 2.2 from IHS dated 6 March 2006. These clauses permitted semen imported into Australia to be directly exported to New Zealand, provided the semen met requirements for importation of semen from the country of origin into New Zealand. Removal of those clauses precludes Australia from exporting semen to New Zealand that has met both Australia’s and New Zealand’s import conditions.

Australia therefore suggests that these relevant clauses remain as in the current IHS (dated 6 March 2006).

MAF Biosecurity New Zealand comment:
Comments noted. The standard will be amended to reincorporate these clauses.

2  Biosecurity Australia

2.1  PART D VI Veterinary Certificate, point 1.6
New Zealand proposes that containers of semen for export are ‘held at an approved storage place under the supervision of AQIS until the time of export’. In Australia, canine semen is collected by registered veterinary surgeons. There are no approved collection or storage facilities for canine semen supervised by AQIS.

Australia requests that this requirement remains as worded in the current IHS (dated 6 March 2006). That is, ‘the containers were stored under veterinary supervision until export’.

MAF Biosecurity New Zealand comment:
Comments noted. We have discussed this issue and understand that there is no accreditation specific to veterinarians for the collection, processing or storage of semen. Given this we agree to change the wording back to that in the current standard.

3  Kirsten Roberts

3.1  PART D VI Veterinary Certificate, point 1.6
What constitutes "an approved storage place"? and when it states "under the supervision of AQIS" how closely supervised is the semen to be?

Semen is usually collected and stored within a veterinary clinic environment. Once frozen down the semen is stored in liquid nitrogen at -190 degrees. In some instances there is a delay between when semen is collected and when it is exported - eg a dog that was collected 4 years ago and is since deceased.
The semen meets all of the criteria with regards to health certification but has been stored at a veterinary hospital in liquid nitrogen.

**MAF Biosecurity New Zealand comment**  
Comments noted. Please refer to response under 2.1 above.

4 Kirsten Roberts

4.1 "The semen has been stored only with other semen.."
What disease [sic] are you worried about being transmitted between stored semen when the semen is individually sealed in straws or vials and stored at a temperature of -190

**MAF Biosecurity New Zealand comment**  
Thanks for your comments. This is a standard measure and should help prevent semen straws not collected for New Zealand being inadvertently incorporated with the New Zealand straws. This is not such a significant risk in a dog but it is a follow on from concerns with livestock semen when hundreds of straws are included in one consignment.
APPENDIX ONE: COPIES OF SUBMISSIONS

Ref: 2006/01959

October 2007

Ms Vivian Dalley
Biosecurity New Zealand
Ministry of Agriculture and Forestry (MAF)
PO Box 2526
Wellington
NEW ZEALAND

Dear Ms Dalley

Response to Biosecurity New Zealand amendments to Import Health Standards (IHS) for Canine Semen from Australia and Frozen Canine Semen from Specified Countries (dated 29 August, 2007)

Biosecurity Australia (BA) makes the following points for consideration in relation to the amended IHS for the importation of Canine Semen into New Zealand (dated 29 August 2007):

- **PART B importation procedure point 5**
  New Zealand has removed clauses PART B, point 5.2 and PART D, VI, points 2.1 and 2.2 from IHS dated 6 March 2006. These clauses permitted semen imported into Australia to be directly exported to New Zealand, provided the semen met requirements for importation of semen from the country of origin into New Zealand. Removal of those clauses precludes Australia from exporting semen to New Zealand that has met both Australia’s and New Zealand’s import conditions. Australia therefore suggests that these relevant clauses remain as in the current IHS (dated 6 March, 2006).

- **PART D VI Veterinary Certificate, point 1.6:**
  New Zealand proposes that containers of semen for export are held at an approved storage place under the supervision of AQIS until the time of export. In Australia, canine semen is collected by registered veterinary surgeons. There are no approved collection or storage facilities for canine semen supervised by AQIS.

  Australia requests that this requirement remains as worded in the current IHS (dated 6 March, 2006). That is, ‘the containers were stored under veterinary supervision until export’.

An amended IHS incorporating the above comments is attached for your consideration.
BA makes the following points for consideration in relation to the amended IHS for Frozen Canine Semen from Specified Countries (dated 29 August 2007):

- **PART D Veterinary Certificate VI Donor Dog**
  
  Point 1. New Zealand has omitted the Republic of South Africa (RSA) from the list of specified countries. BA would appreciate an explanation for the reason for this omission as Australia currently accepts canine semen from RSA.

  Point 2. New Zealand has removed the rabies vaccination requirements and added a clause that requires that the donor dog has not been given a live rabies vaccine during the six months preceding collection of the semen. BA would appreciate an explanation for these changes.

- **PART D Veterinary Certificate VI Testing/Treatments**
  
  Point 6.1.2 New Zealand has added the option for treatment with 'antibiotics effective against *Leptospira spp* to be added to the diluent. BA would appreciate information on the antibiotics that New Zealand considers effective against leptospires and the concentrations required.

Thank you for the opportunity to comment on these Import Health Standards.

Yours sincerely

Robyn Martin  
General Manager  
Animal Biosecurity

cc: Leone Basher, Acting Team Manager Animal Imports, Biosecurity New Zealand  
Ainslie Brown, Live Animal Imports, Animal Programs, AQIS
From: Total Vets [mailto:totalvets@xtra.co.nz]
Sent: Wednesday, 17 October 2007 7:26 a.m.
To: Plant Imports
Subject: [Requires Classification] Canine semen from Australia

I am sorry that this submission is late but I have had a family bereavement and hope that my comments will still be considered.

In respect to the draft for importation of semen from Australia

Under section D 1.6
What constitutes "an approved storage place"? and when it states "under the supervision of AQIS" how closely supervised is the semen to be?

Semen is usually collected and stored within a veterinary clinic environment. Once frozen down the semen is stored in liquid nitrogen at -190 degrees. In some instances there is a delay between when semen is collected and when it is exported - eg a dog that was collected 4 years ago and is since deceased. The semen meets all of the criteria with regards to health certification but has been stored at a veterinary hospital in liquid nitrogen.

"The semen has been stored only with other semen.."
What disease are you worried about being transmitted between stored semen when the semen is individually sealed in straws or vials and stored at a temperature of -190

In respect to the draft for importation of semen from countries other than Australia

"The semen collection period was no greater than one month"

I assume this is referring to multiple collections. If this is the case then when is the date for Brucella testing taken as potentially one of the collections could fall outside of the 3-6 week period.

12"The containers were held in an approved storage place....." Again what is an "approved storage place" - Is a veterinary hospital approved? and how close is the supervision to be?

8. "All extender components are prepared..."
Most extenders contain egg yolk. This can not be deemed to be sterile as the yolk cannot be cooked. Would it not be better to state that the egg yolk was obtained from disease free birds?

Thank you for your consideration of my comments.

I look forward to the final drafts.

Regards,

Dr Kirsten Roberts BVSc
Total Veterinary Services.