



# **Review of Submissions on the Draft Standard for Low Security Farm Animal Transitional Facilities**

**154.02.13**

Ministry of Agriculture and Forestry  
Biosecurity New Zealand  
Wellington  
New Zealand

**May 2008**



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Import Standards Group  
MAF Biosecurity New Zealand

**REVIEW OF SUBMISSIONS ON:**

**Draft Standard for Low Security Farm Animal Transitional Facilities**

April 2008

Approved for general release

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



## INTRODUCTION

The draft standard for **Low Security Farm Animal Transitional Facilities** was notified for public consultation on 25 February 2008. Submissions closed on 4 April 2008.

**MAF Biosecurity New Zealand (MAF BNZ) received submissions from the following people:**

<b>Name*</b>	<b>Organisation represented</b>	<b>Date received</b>
<a href="#">Jan Connelly</a>	none	07/03/08
<a href="#">Vivien Dostine</a>	Bridleways Auckland	10/03/08
<a href="#">Crispin Bennett</a>	Crispin Bennett International Horse Transport Pty Ltd	11/03/08
<a href="#">Leanne Perry-Meyer</a>	Department of Conservation Biosecurity Technical Officer Wellington	19/03/08
<a href="#">John &amp; Allison Lozell</a>	Sea Horse Sea Freight Ltd	4/04/08

\*Links to submissions.

Below in Section A are the main points of concern raised by the public submissions and MAF BNZ's responses. Section B contains the submissions received from members of the public on the draft consultation document **Draft Standard for Low Security Farm Animal Transitional Facilities**.

## **A: Main points raised by respondents and MAFBNZ comment**

### **1. Jan Connelly**

#### 1.1 Comment

Jan Connelly requested information how animal welfare is taken into account in the creation of animal facilities standards.

#### MAF BNZ Response

MAF endeavour to take into consideration issues of animal welfare in developing animal facilities standards. The Animal Welfare Group in MAF is designed specifically for the purpose of investigating and monitoring animal welfare issues. All standards written for facilities for the containment of animals go through an extensive consultation period before they are finalised in an effort to uncover any issues that may inadvertently not have been taken into account. Moreover, once a facility is registered to a MAF animal containment standard it is monitored continually and audited annually to ensure compliance with the Standards. Any notifications of mistreatment or abuse of animals are taken very seriously. Further information on the MAF Animal Welfare Group can be obtained at <http://www.biosecurity.govt.nz/animal-welfare>

### **2. Vivien Dostine, Bridleways Auckland**

#### 2.1 Comment

In relation to equine facilities, clerical Staff entering a facility but not having direct contact with horses should also be required to “shower out”, as germs may be spread around a facility, and not only obtained from direct contact with horses.

#### MAF BNZ Response

The only people entering the quarantine facility should be those listed in the operating manual, e.g. the Operator, vet, or a representative of MAF BNZ. Any person entering the quarantine area where animals are kept, i.e. the “clean” zone including the shower area, inner change room and quarantine area, and who are working with the stock are required to shower and change before leaving the facility. Persons not performing functions relating to animal upkeep should not be entering the facility. The Standard has been reworded to reflect this more clearly.

### **3. Crispin Bennett, Crispin Bennett International Horse Transport Pty Ltd**

#### 3.1 Comment

Fencing requirements in the standard are too onerous, and will incur extra costs on prospective operators.

#### MAF BNZ Response

The requirements for 2m high fences are uniform throughout most animal Transitional Facility Standards. This is not a change from the previous Standard. As facilities will be applying to receive quarantine status, containment requirements must be more stringent than just the average property fence. Having a 2m fencing requirement ensures that this is the case.

### 3.2 Comment

The facility Standard should also take into account the area of land that should be available for animals to use.

#### MAF BNZ Response

Approvals are granted pursuant to the numbers of animals expected to be imported into a quarantine facility. The supervisor takes into account the suitability of a facility prior to the importation of animals and during the import permit process. If the facility is unsuitable to the number of animals to be imported restrictions will be placed by the supervisor.

### 3.3 Comment

How long will the requirement for horses from Australia to go into quarantine in New Zealand be in place?

#### MAF BNZ Response

MAFBNZ are currently evaluating Australia's Equine Influenza status. The requirements for quarantine are expected to continue until MAFBNZ release an updated Import Health Standard, any changes to this will go through a public consultation process.

## **4. Leanne Perry-Meyer, Department of Conservation**

### 4.1 Comment

The definition of a 'farm animal' should be amended to include the term 'domesticated'.

#### MAF BNZ Response

This can be amended in the Standard.

### 4.2 Comment

Any findings of weed seeds should also be reported as it could indicate a non-conformance of pre-export conditions.

#### MAFBNZ Response

Import health standards require an external check of a horse prior to export. Any external contamination found on arrival in New Zealand could indicate a non-compliance with this requirement. However this would depend on the level of contamination found. The level of risk posed is not significant as the check in New Zealand results in the destruction of the material as per the Standard. If a high level of external contamination was found, clearly indicating that a horse had not been checked prior to export, this may result in further investigation taking place.

### 4.3 Comment

Sewerage systems that are used for waste disposal should first be approved by MAF before they are approved as able to dispose of quarantine waste effectively.

#### MAF BNZ Response

MAF BNZ notes this as a valid point, and a distinction has been made in the Standard between storm water systems and sewerage systems. Council sewerage systems are used by facilities only for the disposal of liquid wastes, eg water used for cleaning down a facility, and should not include faecal matter or animal tissue, which goes for deep burial or incineration. Any council sewer system used must have treatment steps as a part of the system, and this is deemed as sufficient for dealing with the relatively low levels of risk coming from these types of quarantine facility. Facilities for higher levels of quarantine require more extensive treatment of liquid waste.

#### 4.4 Comment

Appendix 4 should be renamed to include all members of the family *Equidae*, not just horses.

#### MAF BNZ Response

This will be amended in the Standard.

#### 4.5 Comment

In Section 2 of Appendix 4, the term horses should again be changed to include all members of the family *Equidae*.

#### MAF BNZ Response

This will be amended.

#### 4.6 Comment

The standard should also mention that dogs should be kept out of equine quarantine facilities as they may be a vector for the spread of equine influenza.

#### MAF BNZ Response

No animals other than quarantine animals should be entering the facility at any time that quarantine animals are present. This is standard practice and no quarantine facilities should be operating under other circumstances.

### **5. John and Allison Lozell, Sea Horse Sea Freight Ltd**

#### 5.1 Comment

There need to be requirements for grooms and people that travel with the animals from overseas to go straight to the transitional facility for decontamination for themselves and any associated clothing or equipment.

#### MAF BNZ Response

This will be included in the Standard.

#### 5.2 Comment

Vets who attend animals in quarantine should not be attending any other animals outside of quarantine during the same period.

#### MAF BNZ Response

It is not the practice of MAFBNZ to restrict vets from attending other animals after attending a quarantine facility, however all people entering quarantine will be

expected to follow the proper decontamination procedures upon exiting the facility. Vets and other people who have close contact with any animals in quarantine are required to wear protective clothing in the facility and on exit must fully shower and change clothing, leaving the contaminated clothing behind for laundering. These measures if strictly adhered to are deemed sufficient risk mitigation practices.

## **B: Public Submissions Received**

### **1. Jan Connelly**

This is on the subject of animal-exports, and the Notification of Consultation: Facility Standard for Low Security Farm Animal Transitional Facilities.

Please send to myself information about the practicalities on how the horses will be treated, about the facility standard for low security farm animal transitional facilities, I'm worried about the horses will be treated, and that since often the Government does not even try to take into account, the humane and the compassionate approach to the animals, and that we all need to clearly recognise and realise that animals have feelings too.

To summarise: please, be kind to the animals, they have emotions of fear, they have nerve-endings that if abused can cause pain, they have joyfulnesses, if treated right. So, please take into account the most compassionate ways possible to treat the animals. Be merciful, please.

### **2. Vivien Dostine, Bridleways Auckland**

I would like to see Requirement 4, in relation to 'clerical staff' reworded. The current wording exempts clerical staff from showering out if they do not come into direct contact with horses. However, equine flu may be spread by aerosol droplets which may travel up to 32 metres (your own fact sheet) or by transfer of infected material.

The layout of facilities may mean that clerical staff could walk through a potentially infected yard, across a loading area. It may also be that they could come into contact with protective clothing (used by those authorised to have contact with horses) if it is stored at or near an entrance. Under the current wording they would believe that they do not pose any potential threat since they have not had 'contact with horses'.

I would therefore like to see this exemption only apply if staff have not been within any area which may potentially contaminated by any infected horse, not just direct contact with horses.

### **3. Crispin Bennett, Crispin Bennett International Horse Transport Pty Ltd**

We are a horse shipping company based in Australia. We work in conjunction with 3 NZ based shipping agents, Collins Equine Transport, ICE Bloodstock and Asia Pacific Bloodstock Transport arranging transport for horses between NZ/Australia and vice versa.

We are concerned that the fencing requirements for horses appendix 4 are too drastic and that this will lead to further monopolisation of the horse transport industry in and out of NZ by IRT and New Zealand Bloodstock (who work together as a cartel) as costs to set up such a facility will be prohibitive, except for the very large operator.

It would appear that a 2 metre high outside fence is overkill. Horse properties do not normally use 2 metre high fencing, so it is extremely unlikely that any existing facility will have such fencing in place. Apart from being unnecessary for the retention of horses (or keeping other equines out) they are unsightly, they make the place look like a prison, and cost too much.

Please also consider the size of the property required. Just say the internal area where the quarantined animals were to be kept was 1 hectare (100m x 100m) although this is probably quite a lot too small if you considering a facility to hold 12-20 horses and with a suitable number of turn out yards, then you would need to fence in an area of at least 300m x 300m (9 hectares) which would involve a 2 metre high fence at least 1200 metres long. In practice it would probably need to be considerably longer than this. Having an empty area of 8 hectares to surround it will also present difficulties. Those sort of areas are just not available. Properties have hedge rows and tree lines, other fences, wooded areas, creeks etc. that they would not want to bulldoze.

In all probability we'd use a farm that was bigger than 9 hectares to get the 100 metre separation but the fencing requirement will greatly limit the possible properties we could use. We might also work on the basis that surrounding properties were not horse properties in order to give the required separation.

We would suggest that the wording be changed to Stock Proof Fences and no height limit be set. This way existing fencing ought to be sufficient, or modifications would not need to be too extensive.

Another issue is the uncertainty of how long the requirement for Australian origin horses to be held in such a facility will go on for. An indication from NZ MAF of a time line (assuming no further outbreaks of EI in Australia) would be appreciated as it will give a guide line as to how long a property could expect to receive an income from such a venture for. This will determine the size of an investment that could be feasible.

If it is for a relatively short period then it would greatly limit the investment someone could make in a facility. Also, for many horse owners they may choose just not to transport horses during that time as the extra cost will be significant, which again might not worthwhile if it is only going to be a relatively short lived requirement.

We look forward to your response.

#### **4. Leanne Perry-Meyer, Department of Conservation**

##### **Comments on the Facility Standard for Low Security Farm Animal Transitional Facilities**

Thank you for the opportunity to review this draft standard. The Department has the following comments:

##### **General comments**

##### **Appropriateness of the standard**

In general, we consider that the standard appropriately identifies and mitigates the risks of the import and holding of farm animals during post entry quarantine.

### **Writing Style**

We note that the standard is written in a “listing format” which at times was difficult to always understand especially when the requirements were either quite detailed or were of a significant number i.e. 2.1.2 Site approval. We suggest a numbering of paragraphs with subsequent sub numbering may be helpful and or a review of the information to see if it can be broken down into further headings.

### **Specific comments**

#### **Definition of Farm Animal**

Given the quarantine facilities are low security, we suggest that this definition includes that the animals must be “domesticated” to distinguish the imports from wild sources or varieties which may pose a more significant risk of escape and therefore require a higher level of containment.

#### **4.8.2 Prevention of weed establishment**

We note that there is an absence of the requirement to report findings of weed seeds either externally or internally (from observations of faecal material) to the supervisor and thereby MAF.

The presence of either **seeds, external/internal parasites or in fact any form of contamination of the stock** is likely to indicate a non compliance of the pre-export quarantine requirements and must be reported and investigated.

We also note that in this section 4.8.2 includes that all faecal material passed during the 14 days of quarantine must be disposed of by deep burial etc. We suggest that this should be qualified that this period will be extended if pests and diseases are suspected as being present in the imported animals.

#### **4.10 Sewage systems/landfill**

The department has highlighted in numerous IHS that sewage systems and landfills may be of variable quality around New Zealand with small town systems having the potential to be less effective at waste treatment than more modern city systems. Therefore we suggest that MAFBNZ always stipulate that the sewage systems/landfills to be used must be **approved by MAFBNZ** as suitable for the disposal of the wastewater etc.

### **Appendix four – Requirements for facilities holding horses**

We suggest that this title is amended to holding facilities for domesticated species in the family *Equidae* given that ponies, donkeys, and mules, may be imported into these types of facilities for quarantine and are also susceptible to EI.

### **Additional requirements**

Section 2 includes that the quarantine facility must be sited at least 100 metres away from areas accessed by other horses, again we suggest this should be expanded to include other species of *Equidae* i.e. ponies, donkeys, and mules with the first two being relatively common as pets.

We also note that a relevant consideration is the location of zoos and safari parks, which although these will not frequently occur near sites proposed as quarantine facilities nevertheless present some risk of exposure for other Equidae species such as Zebra.

### **Risks of transmission of EI via dogs**

There is a growing body of evidence that indicates that EI can be transmitted to dogs<sup>1</sup>, which then may or may not pose the risk of acting as vectors of the virus. We note that the facility requirements are likely to restrict the presence of dogs, however as they are common pets which can be allowed to roam, it is important that persons that come into contact with the facility are fully aware that dogs must be kept from contact with the animals and in particular horses. It is also essential that the facility operator ensure that neighbouring dogs are unable to access the facility.

## 5. John & Allison Lozell, Sea Horse Sea Freight Ltd

Re: Draft Standard for Low Security Farm Animal Transitional Facilities

We are extremely concerned that the above document makes no mention of the requirements of the personnel that have been in contact with imported horses from when they leave their country of origin until they arrive in NZ. It does state the measures that should be taken by the truck driver if he has to handle the horses after they arrive in NZ.

However, there is no mention made of the MAF vet who inspected and released the horses when they arrived at the airport or wharf.

And more importantly there is no mention of the groom who has accompanied and tended to the horses since they left their country of origin.

Surely, it would be far more sensible to have the groom accompany the horses back to quarantine, thoroughly shower and shampoo and leave all clothing at quarantine to be washed. Currently, the traveling grooms are free to hop in their car and go wherever they wish. No mention is made of staying away from other horses for any period of time.

There are no controls in place to stop them coming in contact with other horses or other people who work in the industry while there is the chance of them being contaminated.

Another major concern we have is that the vet who attends the quarantined horses is then able to go and attend to other non-quarantined horses belonging to the general public on the same day. How can this be a good quarantine practice? The vet who attends the quarantined horses at the quarantine station should deal with those horses only for the period of their quarantine.

These are some thoughts for you to consider.

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<sup>1</sup> Daly JM, Blunden AS, MacRae S, Miller J, Bowman SJ, kolodziejek J, Nowotny N, Smith KC. 2008 Transmission of equine Influenza Virus to English Foxhounds <http://www.cdc.gov/EID/content/14/3/461.htm>