

**REVIEW OF SUBMISSIONS ON:**

**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW ZEALAND OF FROZEN CANINE SEMEN FROM SPECIFIED COUNTRIES**

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

**1 May 2008**

Import Standards Group  
MAF Biosecurity New Zealand

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**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW ZEALAND OF FROZEN CANINE SEMEN FROM SPECIFIED COUNTRIES**

01 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:

<b>Mauricio Lopez Veterinary Adviser International Animal Health Department for Environment, Food &amp; Rural Affairs UK</b>	<b>10/10/2007</b>
<b>Kirsten Roberts</b>	<b>17/10/2007</b>
<b>Robyn Martin, General Manager Biosecurity Australia</b>	<b>10/10/2007</b>

This document summarises the issues raised in the submissions, and presents the MAF response to each.

## SUBMISSIONS

### 1. Department for Environment, Food & Rural Affairs UK

- 1.1 The industry has asked us what would happen to semen collected over the past 25-30 years. The import standards have obviously changed in that time, the donors may be dead, and some of its semen under the old conditions may already be in New Zealand under the old standards. Would Biosecurity look at the possibility to allow this semen to be imported, together with certain veterinary certificate on cause of death, health etc.

#### **MAF Biosecurity New Zealand comment:**

In principle, the semen is not eligible for importation. If they wish to pursue these consignments further industry would need to make a request for equivalence via the appropriate channels.

### 2. Department for Environment, Food & Rural Affairs UK

- 2.1 Part C, paragraph 7.3 refers. We would like to ask Biosecurity to define the term 'semen distribution'. If we understand correctly that would mean records of whether semen from that dog has been exported to other countries. Our industry has commented that is confidential information between the collecting vet and the stud dog owner, and have asked to re-consider this requirement as confidentiality might then be broken, and be a breach of professional standards.

#### **MAF Biosecurity New Zealand comment:**

Clause 7.3 under Biosecurity Clearance refers to the distribution of the semen once it is in New Zealand rather than distribution of the semen from the UK to other countries. This information is necessary in for traceability purposes within New Zealand in the event of a disease outbreak in the country of origin.

### 3. Department for Environment, Food & Rural Affairs UK

- 3.1 Part D, section V: It would be very useful if Biosecurity could define (or provide examples) of 'person authorised to take a statutory declaration'. Would an Official Veterinarian be considered as an authorised person?

#### **MAF Biosecurity New Zealand comment:**

A person who is authorised to sign a statutory declaration includes: a Judge, a Commissioner of Oaths, a notary public, a Justice of the Peace, or any person authorised by the law of that country to administer an oath there for the purpose of a judicial proceeding, or before a Commonwealth representative.

### 4. Department for Environment, Food & Rural Affairs UK

- 4.1 Part D, section VI, paragraph 5. Months have either, 31, 30, 29 or 28 days, to avoid problem with interpretation it would be appropriate to change it to 4 weeks. Our industry considers this requirement 'very bureaucratic' (verbatim) because if the collection were carried out during, lets say, 5 weeks all the tests and formal declarations would have then to be repeated for any collections made outside that statutory period.

#### **MAF Biosecurity New Zealand comment:**

Comments noted. We will amend the clause to read the semen collection period was no greater than 30 days.

**5. Department for Environment, Food & Rural Affairs UK**

- 5.1 Part D, section VI, paragraph 8. We are unclear as to whether sterilisation of the extender is required (for milk, this would be all right, however in case of egg yolk this would be impractical). Would it be better to change it to 'prepared in aseptic conditions'. The spelling of 'principals' in section 8 is wrong. It should be 'principles'.

**MAF Biosecurity New Zealand comment:**

Comments noted. We agree, changed to 'prepared under aseptic conditions'. Principles will also be corrected.

**6. Department for Environment, Food & Rural Affairs UK**

- 6.1 Part D, section VI, paragraph 9. Our industry has informed us that there are no equivalent commercial preparations available in the market. Many vets would have their own recipe for the extender, cryoprotectant, etc.

**MAF Biosecurity New Zealand comment:**

Comments noted. Further information was requested from DEFRA with regard to the availability of commercially prepared extenders and it was noted that although available, privately prepared options were prepared and that to continue to include this clause could potentially kill off trade. The issue was further discussed with the Risk Analysis Group. They advised that no measures are necessary for eggs used in extenders due to the extremely remote likelihood of dog semen being eaten by poultry or other birds.

**7. Department for Environment, Food & Rural Affairs UK**

- 7.1 Part D, section VI, paragraph 10. The industry has commented that instead of 'indelibly identified', the straws should be 'marked'.

**MAF Biosecurity New Zealand comment:**

Comments noted. We will amend this to say "clearly marked/identified"

**8. Department for Environment, Food & Rural Affairs UK**

- 8.1 Part D, section VI, paragraph 12. We consider that the supervision should be carried out by the Official Veterinarian.

**MAF Biosecurity New Zealand comment:**

That is the intention of this clause by noting under the supervision of the exporting authority. Paragraph will be reworded as noted above.

**9. Biosecurity Australia**

- 9.1 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

**MAF Biosecurity New Zealand comment:**

This is an error. Our intention is to allow the importation of dog semen from every country from which we currently import live dogs including the Republic of South Africa. This will be corrected and RSA duly added to the list of specified countries.

## **10. Biosecurity Australia**

### **10.1 PART D Veterinary Certificate VI Donor Dog**

Point 1. 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 of these changes.

#### **MAF Biosecurity New Zealand comment:**

Semen is not known to transmit rabies infection. There may be a remote possibility that it could be in semen just prior to a dog developing clinical signs of rabies. For frozen semen of dogs the OIE recommends that the dog is certified as showing no clinical signs of rabies during the 15 days following collection. Virus appears in saliva up to 7 days prior to clinical signs. This safeguard is sufficient to mitigate the risk should virus be present in semen, as the virus would most likely appear in the semen at the same time it appears in the saliva.

We therefore removed the rabies vaccination requirement and included the OIE recommendation instead. Instead of 15 days we have allowed this certification of no clinical signs to be done with the *Brucella canis* testing 3-6 weeks post collection.

## **11. Biosecurity Australia**

### **11.1 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.

#### **MAF Biosecurity New Zealand comment:**

We have received confirmation from a New Zealand animal reproductive specialist that a combination of Penicillin and an amino-glycoside (gentamicin, streptomycin) should be very effective against any leptospires in the semen.

## **12 Kirsten Roberts**

### **12.1 "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.

#### **MAF Biosecurity New Zealand comment**

Thank you for this comment. We have amended the standard to state that the *Brucella canis* test must be done 3 to 6 weeks after the last collection date within the 30 day collection period.

## **13 Kirsten Roberts**

### **13.1 "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?

#### **MAF Biosecurity New Zealand comment**

Approved storage place would be a place approved by the official veterinary administration of the country of export for the purposes of storing canine semen.

## **14 Kirsten Roberts**

### **14.1 "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?

### **MAF Biosecurity New Zealand comment**

Comments noted. The clause will be amended slightly to read "all extender components are prepared and handled under aseptic conditions. Please refer to Question 6.1.

## 12. APPENDIX ONE: COPIES OF SUBMISSIONS

### UK COMMENTS ON THE IMPORT HEALTH STANDARD FOR FROZEN CANINE SEMEN FROM SPECIFIED COUNTRIES

1. The industry has asked us what would happen to semen collected over the past 25-30 years. The import standards have obviously changed in that time, the donors may be dead, and some of its semen under the old conditions may already be in New Zealand under the old standards. Would Biosecurity look at the possibility to allow this semen to be imported, together with certain veterinary certificate on cause of death, health etc.
2. Part C, paragraph 7.3 refers. We would like to ask Biosecurity to define the term '*semen distribution*'. If we understand correctly that would mean records of whether semen from that dog has been exported to other countries. Our industry has commented that is confidential information between the collecting vet and the stud dog owner, and have asked to re-consider this requirement as confidentiality might then be broken, and be a breach of professional standards.
3. Part D, section V: It would be very useful if Biosecurity could define (or provide examples) of '*person authorised to take a statutory declaration*'. Would an Official Veterinarian be considered as an authorised person?
4. Part D, section VI, paragraph 5. Months have either, 31, 30, 29 or 28 days, to avoid problem with interpretation it would be appropriate to change it to 4 weeks. Our industry considers this requirement 'very bureaucratic' (verbatim) because if the collection were carried out during, lets say, 5 weeks all the tests and formal declarations would have then to be repeated for any collections made outside that statutory period.
5. Part D, section VI, paragraph 8. We are unclear as to whether sterilisation of the extender is required (for milk, this would be all right, however in case of egg yolk this would be impractical). Would it be better to change it to 'prepared in aseptic conditions'. The spelling of 'principals' in section 8 is wrong. It should be '*principles*'.
6. Part D, section VI, paragraph 9. Our industry has informed us that there are no equivalent commercial preparations available in the market. Many vets would have their own recipe for the extender, cryoprotectant, etc.



**Australian Government**  
**Biosecurity Australia**

Ref: 2006/01959

9 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.

Edmund Barton Building Barton ACT GPO Box 858 Canberra ACT 2601 Tel +61 2 6272 3933 [www.biosecurityaustralia.gov.au](http://www.biosecurityaustralia.gov.au)

**DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY**

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.