

REVIEW OF SUBMISSIONS ON:

DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION OF ZOO PRIMATES FROM AUSTRALIA AND THE UNITED KINGDOM.

MAF Biosecurity New Zealand
Wellington
New Zealand

5 September 2008

Ministry of Agriculture and Forestry
Te Manatu Ahuwhenua, Ngaherehere
Pastoral House
25 The Terrace
P O Box 2526
Wellington
New Zealand

Telephone: +64 4 474 4100
Internet: <http://www.maf.govt.nz>

Border Standards Directorate
MAF Biosecurity New Zealand

REVIEW OF SUBMISSIONS ON:

**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW
ZEALAND OF ZOO PRIMATES FROM AUSTRALIA AND THE UNITED
KINGDOM**

5 September 2008

Approved for general release

Rachelle Linwood
Animal Imports & Exports Group Manager
MAF Biosecurity New Zealand

INTRODUCTION

The draft import health standard for the importation into New Zealand of zoo primates from Australia and the United Kingdom was notified for consultation on 29 August 2008.

MAF received submissions from the following:

Phil Bell, Department of Conservation	15 August 2008
Margaret Leggoe, Biosecurity Australia	13 August 2008

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

SUBMISSIONS

Phil Bell, Department of Conservation

- 1.1 The Department had nothing of concern to comment on except for one typographical error. Under Section 3, Equivalence the second sentence refers to poultry products instead of zoo primates.

Biosecurity New Zealand comment:

Comments noted. Standard will be corrected.

Margaret Leggoe, Biosecurity Australia

- 2.1 We note that under 7. ELGIBILITY FOR IMPORTATION, 7.3 The primates and the zoo, in which the primates reside, must have been free of quarantine restriction during the 90 days prior to the scheduled date of export. Current import conditions for nonhuman primates into Australia require the animals remain under quarantine surveillance for life. Therefore AQIS would not be able to certify that imported nonhuman primates meet the above condition. However, nonhuman primates born in Australia are not subject to quarantine and AQIS could certify that these animals meet the above requirement

Biosecurity New Zealand comment:

This is not a new clause. It is (and has been) certifiable as in New Zealand 'under quarantine surveillance for life' is referred to as containment within a containment facility, and 'free of quarantine restriction' refers to being free of physical separation from other animals for reasons of disease control- most often pre or post importation.

This clause is designed to ensure that all potential disease risks attached to an imported animal have been mitigated and that the animal is, in all intents and purposes, the same biosecurity risk as an animal born in that country of origin.

- 2.2 IV:SANITARY INFORMATION, Testing and treatments, 4.3 The primate was subjected to two faecal cultures with negative results for bacterial pathogens including Salmonella, Shigella and Yersinia spp at least 14 days apart. The clause "bacterial pathogens including" implies the sample must be free from unnamed organisms..... We believe it would be better if the condition just specifies and agents of quarantine concern to NZ and avoids too comprehensive wording.

Biosecurity New Zealand comment:

Comments noted. Standard will be changed to specify Salmonella, Shigella and Yersinia spp only.

- 2.3 Sanitary certificate bears the title NEGOTIATED EXPORT CERTIFICATION however it does not specify who the negotiating parties are.

Biosecurity New Zealand comment:

Comments noted. Discussed internally and agreed that this heading can be removed from our standards.

- 2.4 Veterinary Certificate A, 4.6, two tuberculosis tests required but test not specified. Several tests for tuberculosis have been developed, some with greater reliability than others. Would you consider specifying which tests are acceptable to NZ MAF

Biosecurity New Zealand comment:

This is not a technical review or update of the testing requirements of this import health standard. It is the addition of a new country under existing conditions. MAF Biosecurity New Zealand is aware technical details need updating and intends to comprehensively review and update the entire import health standard after the draft Australian Risk Analysis has been finalised and a New Zealand addendum has been drafted, consulted and published

- 2.5 Under 3, Equivalence – reference to poultry products.

Biosecurity New Zealand comment:

Comments noted. Standard will be corrected.

2.6 APPENDIX ONE: COPIES OF SUBMISSIONS

From: pbell@doc.govt.nz

Sent: Friday, 15 August 2008 3:20 p.m.

To: Sally Aitken

Cc: cwest@doc.govt.nz

Subject: [Requires Classification] Comments on the IHS for primates from UK and Australia

Hi Sally,

Thank you for the opportunity to comment on this amended IHS for zoo primates from the UK and Australia.

The Department has reviewed this IHS and we have nothing of concern to comment on. We consider the measures included will cover the risk associated with the importation of these animals.

The only thing we did pick up on was a typo on page 2. Under Section 3 Equivalence, the second sentence says "It is expected that the **poultry products** will meet the conditions in every respect". We assume this is meant to say "It is expected that the **zoo primates** will meet the conditions in every respect". (A cut and paste error perhaps?!)

Please let me know if you need anything else in relation to these comments.

Could I please get confirmation that you've received these comments for our records?

Thanks,

Phil Bell

Senior Technical Support Officer (Biosecurity)
Threats Management
Research and Development Group
Department of Conservation
Wellington
Phone: (DDI) 04 4713283



Australian Government
Biosecurity Australia

File No: 2006/17071

13 August, 2008

Dr Rachelle Linwood,
 International Animal Trade
 Ministry of Agriculture and Forestry
 PO Box 2526
 Wellington, New Zealand
 New Zealand

Dear Rachelle,

Biosecurity Australia has looked at the draft Import Health Standard (IHS) for the Importation of Zoo Primates from Australia and the United Kingdom into New Zealand.

We note that under 7. *ELIGIBILITY FOR IMPORTATION*, 7.3 *The primates and the zoo, in which the primates reside, must have been free of quarantine restrictions during the 90 days prior to the scheduled date of export.*

Current import conditions for nonhuman primates into Australia require the animals remain under quarantine surveillance for life. Therefore AQIS would not be able to certify that imported nonhuman primates meet the above condition. However, nonhuman primates born in Australia are not subject to quarantine, and AQIS could certify that these animals meet the above requirement.

We have some concern with the wording of a paragraph under *IV: SANITARY INFORMATION, Testing and treatments*, 4.3 *The primate was subjected to two faecal cultures with negative results for bacterial pathogens including Salmonella, Shigella, and Yersinia spp at least 14 days apart.* The clause "*bacterial pathogens including*" implies the sample must be free from unnamed organisms. When you consider the rich bacterial flora present in normal faecal samples, it would be almost impossible to meet this requirement. We believe it would be better if the condition just specifies the agents of quarantine concern to NZ and avoids too comprehensive wording.

The sanitary certificate bears the title *NEGOTIATED EXPORT CERTIFICATION*, however it does not specify who the negotiating parties are.

Also on *VETERINARY CERTIFICATE A*, under 4.6, two tuberculosis tests are required without specifying which test. Several tests for tuberculosis have been developed, some with greater reliability than others. Would you consider specifying which tests are acceptable to NZ MAF?

Edmund Barton Building Barton ACT GPO Box 858 Canberra ACT 2601 Tel +61 2 6272 3933 www.daff.gov.au/biosecurityaustralia

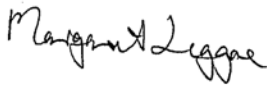
DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Finally, there is copying error under 3. *Equivalence, It is expected that the poultry products will meet the conditions in every respect.*" This seems a little out of place in this context.

Thank you for the opportunity to comment on this IHS for the Importation of Zoo Primates from Australia and the United Kingdom into New Zealand.

I will be retiring shortly, so it is better that you send communications in relation to zoo animals to Dr Louise Sharp (louise.sharp@biosecurity.gov.au)

Yours sincerely



Margaret Leggoe
Senior Veterinary Officer
Biosecurity Australia