

REVIEW OF SUBMISSIONS ON:

**DRAFT IMPORT HEALTH STANDARD FOR HORSES
DRAFT RISK MANAGEMENT PROPOSAL FOR HORSES**

Biosecurity New Zealand
Ministry of Agriculture and Forestry
Wellington
New Zealand

30 June 2011

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30 June 2011

Approved for general release

Matthew Stone
Animal Imports Exports Group Manager
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Introduction

The draft import health standard for the importation into New Zealand of horses was notified for consultation on April 7 2011 and submissions closed May 20 for public consultation and June 1 for WTO routine notification. This import health standard will provide for the importation of horses from approved countries. Current approved countries including Canada, member countries of the European Union, USA, Hong Kong, Japan and Australia will be required to re-negotiate their veterinary/export certificate with MAF subsequent to issue of this import health standard.

MAF received submissions from the following:

- Simon Cooper – on behalf of New Zealand Equine Health Association
- Ross Johnson – IRT New Zealand
- Australia AQIS and Biosecurity Australia
- Hong Kong AFCD
- Canadian Food Inspection Authority (CFIA)
- USDA and APHIS on behalf of the U.S. Government

This document presents the issues raised in the submissions and the MAF response. Please note that MAF have not summarised respondent's submission questions, these have not been corrected for grammatical content. Copies of all external stakeholder submissions in their entirety are presented in Appendix 1.

Acronyms used in the document:

Acronym	Meaning	Acronym	Meaning	Acronym	Meaning
ACVM	Agricultural Compounds and Veterinary Medicines	HBLB	Horsrace Betting Levy Board	PEI	Pre-export isolation
ACVMG	Agricultural Compounds and Veterinary Medicines Group	HI	Heamagglutination-Inhibition Test	PEQ	Pre-export quarantine
AFCD	Agriculture, Fisheries and Conservation Department	HKJC	Hong Kong Jockey Club	PoFA	Places of First Arrival
AGID	Agar(ose) gel immunodiffusion	HS	Harmonized System	QI	Quarantine Inspector
AHS	African Horse Sickness	IATA	International Air Transport association	QUADS	The animal health Quadrilaterals (QUADS)
Ak	Auckland	IDC	The Investigation and Diagnostic Centre (IDC) Animal Health Laboratory	ROS	Review of Submissions
APHIS	Animal and Plant Health Inspection Service (Regulatory agency within the USDA)	IFAT	The indirect fluorescent antibody test	RVM	Restricted veterinary medicine
AQIS	Australian Quarantine and Inspection Service	IHS	Import health standard	SOP	Standard Operating Procedures
BACC	Biosecurity Authority/Clearance Certificate	IP	Import permit	SPS	Sanitary and Phytosanitary (Agreement)
BCP	Biosecurity Clearance Procedures	IRT	International Racehorse Transport	TF	Transitional Facility
BSP	Border Systems Programme	ITB	International Terminal Building	TFGEN	General Transitional Facilities for Uncleared Goods
CEM	Contagious Equine Metritis	MAF	Ministry of Agriculture and Forestry	USA	United States of America
CFIA	Canadian Food Inspection Agency	MAFBNZ	Ministry of Agriculture and Forestry Biosecurity New Zealand	USDA	United States Department of Agriculture
ChCh	Christchurch	MoU	Memorandum of Understanding	VA	Verification Authority

Code	Terrestrial Animal Health Code	NZ	New Zealand	VEE	Venezuelan Equine Encephalomyelitis
CofE	Claim of Equivalence	NZEHA	New Zealand Equine Health Association	VI	Virus Isolation
EHV-1	Equine herpes virus 1	NZFSA	New Zealand Food Safety Authority (formerly, now part of MAF)	VS	Vesicular Stomatitis
EI	Equine influenza	OIE	World Organisation for Animal Health (Originally called Office International des Epizooties,- original acronym retained)	Well	Wellington
EIA	Equine infectious anaemia	OSH	Occupational Safety and Health	WNF	West Nile Fever
EU	European Union	OV	Official Veterinarian	WTO	World Trade Organization
EVA	Equine viral arteritis	PCR	Polymerase chain reaction		

Summary of amendments

The following is a summary of amendments made to the *Import Health Standard for Horses*, the associated guidance document and the risk management proposal as a result of submissions received by MAF during the consultation period:

Note: (new clauses are included in brackets)

Import health standard amendments

- Clause 11 (10) regarding laboratory reports has been amended to allow for tabulated results, certified by the Veterinary Authority, for current approved countries.
- Clause 12 (12) has been amended to allow for submission of a health report table to the Official Veterinarian in New Zealand prior to the horses departure for NZ.
- Clause 20b. (22b.) has been amended to remove reference to active ingredient for vaccinations.
- Clause 20c. (22c.) relating to equine influenza, an equivalence has been placed into the guidance document for previous strains to be used until newer vaccines are released by vaccine companies.
- A reference to the *AQIS/MAFBNZ Schedule of Aircraft Disinsection Procedures* has been made in the final IHS. Clause 21e. and i. (23e. and 23i.) has been amended to allow a treatment certificate to accompany the consignment.
- Clause 21g. (23h.) has been amended to allow other animals that meet relevant NZ import health standards to travel on the airlines.
- The final veterinary inspection prior to export in clause 23 (26) has been changed to 48 hours prior to export.
- Clause 24 (27) has been amended to cater for the fact that all feed and waste is to be disposed of on arrival and will not pose a biosecurity risk, therefore hay has been allowed on all aircraft to be fed to horses destined for NZ.
- Clause 8 (7) and 26 (31) of the IHS has been amended to reference EHV-1 consistently referencing the strains of concern, as is done in the guidance document's model veterinary certificate i.e. equine herpesvirus 1 (abortigenic and paralytic forms).
- Clause 28 (33) regarding CEM has been amended to reflect the impossibility of taking endometrial swabs from pre-pubertal fillies.
- Clause 30 (35) and 31 (36) has been amended to allow for the pre-entry endoparasite and ectoparasite treatment to be completed at the start of pre-export isolation.
- Clause 33a. (38a.) will be amended and reference to EI vaccination will be removed, aligning with the OIE Code.

- Clause 33b. (38b.) has been amended to correct the statement “not more that [sic] 5 days later”
- The EVA clause 36 (40) of the IHS has been amended.
- Clause 41 (46) has been amended to remove the requirement for a MAF-approved vaccine for West Nile fever (WNF) virus.
- Clause 4 (4) of Appendix 1 has been amended to an outcome focussed clause which allows the Veterinary Authority to determine the biosecurity and welfare conditions to manage risk from the PEI to the port of departure.
- Clause 5 (5) of Appendix 1 has been amended to clarify the requirements where a part of the building forms part of the perimeter.
- Clause 9 (9) of Appendix 1 has been re-worded to provide for the practical realities of excluding wildlife from the PEI.
- Clause 25 (24) of Appendix 1 includes the words “must record in a register all their visits”
- *The Standard for General Transitional Facilities for Uncleared Goods Annex O (BNZ-STD-TFGEN)* is referenced in the final IHS.
- MAF has amended those clauses that stated ‘vector protected PEI’ to ‘vector protection in PEI. The expectations of “vector protection” and “vector-proof” are in the guidance document and the two terms are defined in the IHS.
- Clause 32 (32) of Appendix 1 has been removed from the final IHS.
- Clause 34 (32) of Appendix 1 and 45 (6) of Appendix 2 has been re-worded to include further specification regarding temperature elevations. Further detail has also been included in the guidance document.

Guidance Document amendments

- The guidance document clause regarding the tick inspection has been amended to remain consistent with the IHS, allowing a registered veterinarian to complete the tick examination.
- The model veterinary certificate recommendations have been changed with reference to the clause: “For pregnant mares the name of the sire” and replaced with: “For pregnant mares the name of the sire to which the mare is pregnant”
- In the guidance document a comment has been added providing clarification that equine influenza (EI) free countries may administer EI vaccinations for the purposes of exporting horses to third countries without losing their EI freedom, but there is no allowance for EI vaccination use in the general horse population for those countries claiming freedom.
- Included in the guidance document is the addition of information providing MAF’s expectations on “how” vector protection can be met in PEI. In addition, the IHS will include reference to the MAF standard for horses transiting a third country where there is a *Culicoides* risk.
- The front page of the model veterinary certificate Part 1 has been amended to remove the irrelevant terms such as “game restocking”, “re-entry”, “temporary admission” and “category”. HS (Harmonised System of Tariff nomenclature) codes have been pre-filled.
- Part II. Clause 16b (16b) of the model veterinary certificate has been amended to the following “at the final inspection prior to departure”
- Part II. Clause 3 (3), 12 (10), 13 (12), 14 (11), and 17 (16) of the model veterinary certificate has been amended to reflect similar amendments recommended for the IHS above.
- Clause 36 (35) and 38 (37) has been amended to reflect the OIE headings “for uncastrated male horses” and “for horses other than uncastrated males”.

Risk Management Proposal amendments

- Reference to Hong Kong being free of *Chrysoma bezziana* has been deleted.

Other amendments

The following changes have been made to the documents. These changes are the result of MAF's own further consideration of the documents:

Import Health Standard amendments

- Clause 3 has been removed and clearance requirements included in Part B of the IHS under inspection and further detail has been provided regarding MAF Verification and MAF Quarantine Inspector requirements, this information has been duplicated in the guidance document.
- A reference to *The Standard for General Transitional Facilities for Uncleared Goods Annex O (BNZ-STD-TFGEN)* has been made in the IHS.
- References to virucidal disinfectants and aircraft disinsection has been made the same in both the IHS and the guidance document for consistency. A link to the approved treatments standard has been made in both documents.
- Clause 17 of the IHS has been removed and clause 43 (4b.) of Appendix 2 has been amended to allow for the screwworm inspection to be completed in the transitional facility within 24 hours of arrival and this inspection may be undertaken by the attending veterinarian under MAF Verification supervision.
- A clause regarding specific horse identification requirements has been added to the IHS.
- A reference to sea transport has been made in the IHS.
- The requirements for transport containers (both sea and air) cleaning and decontamination has been added to the IHS.
- Clause 4 (4) of Appendix 1 has been amended to make it clear that the exporting country's Veterinary Authority will approve standard operating procedures and complete audits; however MAF reserves the right to request an audit on a case-by-case basis.
- Clause 5 (5) of Appendix 1 has been amended to make the intentions clear regarding fencing the perimeter of the pre-export isolation facility (PEI).
- Clause 7b. (7b.) of appendix 1 has been amended to clarify the meaning of "safe" unloading area.
- Clause 21 (19) of appendix 1 has been amended to allow for staff of the PEI to have showered at home prior to entering PEI.
- Clause 23 (26) of the IHS has been amended to remain consistent with clause 3 (3) of the guidance document stating: "free of clinical signs of disease".

Guidance Document

- The model veterinary certificate has been amended to remove the optional star (*) from the front page, with regards to breed/category, age and sex of the horses in the consignment. This has been mandatory information.
- The veterinary certificate information in the guidance document has been amended to correct the grammatical error making complete sentences from the introductory line plus each subsequent dot point.

General Information for Importing Live Animals

- The general information has been amended to include updated Auckland and Christchurch details and will include contact details for the sea ports of Tauranga and Timaru for those horses travelling by sea from Australia to New Zealand.

Review of submissions

1. Simon Cooper – on behalf of New Zealand Equine Health Association

- 1.1. Part B Approved Countries: The NZEHA notes that MAF ‘lists’ approved countries. On what basis is a country approved and how does MAF satisfy itself that the country has robust trustworthy/transparent systems?

MAF Response: As a member country of the World Organisation for Animal Health (OIE) MAF assesses the quality of Veterinary Services in the exporting country according to the OIE Terrestrial Animal Health Code. The OIE provides a general information document International trade: Rights and obligations of OIE Members, the last paragraph states “Confidence in the quality of veterinary services is the cornerstone of international trade. Good governance, ensuring transparency in disease reporting, efficiency in disease management and reliability in veterinary certification, is key to provide the necessary assurances to trading partners”. All international trade is dependent on mutual trust and this IHS and the country approval process is no different to any other in this respect. The country approval process is explained in the general information document that can be found on the MAFBNZ website <http://www.biosecurity.govt.nz/>

- 1.2. Part B Approved Countries: What is the state of play for each of the currently approved countries regarding independent verification as to their compliance with export systems?

MAF Response: As stated in Part E. Appendix 1 clause 3, MAF reserves the right to audit pre-export isolation facilities and standard operating procedures, however, the basis of trade is dependent on mutual trust and MAF relies on the Official Veterinarian to certify the animals for export and to ensure all clauses of the standard and pre-export isolation requirements are met. This is in line with what New Zealand regulatory authorities expect from partner authorities accountable for safe importation of animals and animal products. In addition MAF has the ability to request audit outcome information of animal health and certification systems assessed by member countries in the animal health Quadrilaterals (QUADS). QUADS countries include Australia, Canada, New Zealand and the United States.

- 1.3. Part B Approved Countries: If further countries are approved, how does MAF do this? Would we receive prior notice?

MAF Response: The country approval process is described in the general information for live animal imports which can be found on the MAFBNZ website. MAF will assess the verifiable health status of the exporting country/zone/compartments; the national systems, legislation and standards in the exporting country for regulatory oversight of the horse industry; and capabilities and preferences of the exporting country’s Veterinary Authority. The country assessment is guided by the World Organisation for Animal Health (OIE) [Terrestrial Animal Health Code](#) (Code) Section 3. Stakeholders will receive notification when there is any additional approved country added to the list.

- 1.4. Part B Approved Countries: What is the process or who is responsible in MAF to carry out monitoring or surveillance so that in the event there is evidence a country has not complied, we are made aware of it and ensure we respond appropriately to any apparent change in the

level of risk? For example, we note that in 2010 Argentina reported that they had a serious outbreak of Equine Viral Arteritis following importation of horses exported from the EU. Was MAF aware of this event and what was our response to this apparent shortfall in the export/importation system in light of the fact that EU countries are approved to export horses into New Zealand? In other words, what is the system, including criteria, to remove a country from the list of approved countries to import into New Zealand?

MAF Response: MAF regularly receives updates from a variety of sources including the relevant Embassy contact points, Ministry of Finance and Trade representatives, Pro-Med and specifically for horses via the Animal Health Trust Information Exchange on Infectious Equine Disease from the International Collating Centre. MAF representatives regularly attend OIE meetings and are an informative source of information regarding current issues which may change the level of risk to the New Zealand horse industry. MAF assesses the information received and depending on the level of risk perceived a rapid risk assessment can be requested and this information is communicated with relevant stakeholders.

1.5. Laboratory section: What does approval of an 'approved laboratory' entail?

MAF Response: Laboratory Approval is dependent on Veterinary Authority oversight; MAF relies on the Official Veterinarian to certify/approve the laboratories and offers flexibility to determine exactly how the Veterinary Authority will "approve" such a laboratory. This is in line with what New Zealand regulatory authorities expect from partner authorities accountable for safe importation of animals and animal products.

1.6. Laboratory section: Do we have a list of approved laboratories in each of the approved countries to allow us to cross check that they are the ones being used for the tests required on animals in imported consignments that enter NZ?

MAF Response: MAF does not hold such a list; however, if it was required MAF has the ability to communicate with the Veterinary Authority in the exporting country for confirmation. As mentioned above the basis of trade is dependent on mutual trust and MAF relies on the Official Veterinarian to certify the animals for export and to ensure all clauses of the standard are met.

1.7. Laboratory section: What audit arrangements do Governments that approve these laboratories complete?

MAF Response: MAF does not issue direction to complete laboratory audits to the Veterinary Authorities from which we currently import horses from. The Veterinary Authority determines the audit rate and assessment criteria for such laboratories and does so with the aim of maintaining confidence and positive relationships among global trading partners. MAF can obtain such lists quickly from the Veterinary Authority websites or by direct communication with the exporting Veterinary Authority.

1.8. Laboratory section: How often do we verify them?

MAF Response: MAF does not specifically verify audit arrangements and as per the SPS agreement relies on Veterinary Authority mutual trust.

- 1.9. Inspection: Inspections at the port of first arrival should be completed in optimal conditions. Are there standards for these port facilities that enable effective inspection and, if necessary, treatment. If not, the NZEHA submits that these should be appended to these Health Standards. The NZEHA submits these should include such standards, for example, as ensuring provision of inspection level lighting.

MAF Response: The Standard for General Transitional Facilities for Uncleared Goods Annex O (BNZ-STD-TFGEN) provides the requirements for arrival ports including airports and sea ports for animal imports to enable such facilities to manage biosecurity requirements. The Standard for General Transitional Facilities for Uncleared Goods Annex O (BNZ-STD-TFGEN) has been referenced in the final IHS.

- 1.10. Pre-export isolation: What does MAF do to satisfy itself that the MAF standard for these PEI premises is complied with on an ongoing basis?

MAF Response: Please see response to 1.2.

- 1.11. Part C: Section 31: For endo-parasite control. The NZEHA notes that the OIE does not appear to have recommendations relating to endo-parasite control.

MAF Response: Noted

- 1.12. Part C: In light of developing resistance to anthelmintics worldwide, the NZEHA submits that, to effectively avoid inadvertent introduction of new resistant species, some benefit may be had in a review of this section by an expert parasitologist. It is the NZEHA's interim recommendation the first endo-parasitological treatment on entry into PEI be followed by faecal egg count tests specific for large and small strongyles. The results of these tests should guide the selection of what ever is selected as the most efficacious product used for the second treatment.

MAF Response: The submitter's recommendation for an expert parasitologist to review the section is noted. MAF sees no value in follow up faecal egg count tests as they are likely to show no evidence of either Cyathostomes or *Strongylus spp.*

- 1.13. Part E Appendix 1: The NZEHA recommends more specificity is required in this standard.

MAF Response: Noted and MAF addresses specific comment in the responses below.

- 1.14. Item 5 includes the word 'Stockproof.' What animals are stock? Can dogs, cats and other smaller animals, for example, enter a facility?

MAF Response: MAF expects the premises to have fences that keep out essentially, other horses. The operators of the facility must not keep domestic pets or other livestock. Livestock refers to horses, mares, mules, jacks, jennies, colts, cows, calves, yearlings, bulls, oxen, sheep, goats, lambs, kids, alpacas, llamas and pigs (this list is not exclusive). MAF understands it is not a practical reality that all small animals such as birds, straying cats and other wildlife could be totally excluded from the premise, but their entry can be minimised with the use of practical deterrents, traps and baits. MAF will re-word the clause to specify the above expectation.

- 1.15. Item 34 describes states 'temperature elevation.' With regard to temperature elevation, precisely what level of increase should be reported to MAF?

MAF Response: The expectation is that an abrupt onset of fever accompanied by other clinical signs such as loss of appetite, diarrhoea, and nasal discharge¹ would be investigated to conclusion and subsequently reported to MAF. This is a guide only and has been placed into the guidance document. Essentially, MAF is reliant on the clinical judgement of any attending or Official Veterinarian.

- 1.16. Item 45 includes a 'significant' rise in temperature during PAQ. What precisely is a 'significant temperature rise?'

MAF Response: Please see response to 1.15.

- 1.17. The NZEHA submits that specificity might be guided by how many horses with elevated temperatures were reported to MAF in the last year and then comparing this with the total number of imports to NZ last year that had to complete PEI.

MAF Response: Noted

- 1.18. Item 50. We suggest a rewording to make clear that the cervical and endometrial swabs must be negative for CEM.

MAF Response: MAF agrees and will amend this clause.

- 1.19. The NZEHA submits that, although it is important to clearly state in certificates the measures that are required, it is just as important there is an independent means of verifying that the country of export has independent, transparent and accountable systems of oversight for the laboratories, the administration of treatments, and the certifying bodies in the country of export are robust. Without these New Zealand's import health requirements do not manage the real risks of disease entry.

MAF Response: MAF is reliant on the Veterinary Services of the Competent Authority for exports of horses to New Zealand and as per the SPS agreement trade is dependent on mutual trust. In the negotiations to approve a country MAF will verify "that the country of export has independent, transparent and accountable systems of oversight for the laboratories, the administration of treatments, and the certifying bodies in the country of export are robust" as described in 1.3.

- 1.20. The NZEHA does not support the current documents under consultation, without aligned documentation that describes a system of overview. By themselves, these documents do not adequately manage the risk of importing an exotic equine disease at the time a horse is imported.

MAF Response: MAF believes the response to the specific submission questions addressed this final comment.

¹ Smith BP: *Large Animal Internal Medicine*, ed 2, Missouri, 1996. Mosby-Year Book, Inc.

2. Ross Johnson – IRT New Zealand

- 2.1. (Documentation 11; Laboratory reports) Considering the OV signs the health certificate attesting to all the test results it seems 'overkill' to require copies of all the test results accompany the shipment.

MAF Response: For current countries approved to import horses into New Zealand we do place trust in the Official Veterinarian (OV) to certify the horses and their associated laboratory results. A summary treatment and testing table is acceptable and has been provided in the guidance document as part of the model veterinary certificate.

- 2.2. (Documentation 12; Health documentation to be supplied to NZ Port Veterinarian at least one working day prior to the shipment arriving) In consequence of the sheer volume of paperwork involved we suggest a checklist showing details (results & dates) for all tests, treatments etc be provided to the port vet one day prior to arrival

MAF Response: MAF agrees that this would be appropriate; however pre-inspection of documents (detailed or a summary) does not guarantee clearance or direction to a transitional facility of all horses.

- 2.3. (Treatment 20 b. Active Ingredient) To our knowledge vaccines do not have an active ingredient/s

MAF Response: MAF agrees and will amend the IHS to reflect this comment.

- 2.4. (Treatment 20 c. Equivalent Strains of EI virus as recommended by the OIE) To our knowledge there is a lag, often substantial, between the recommendations of the OIE code and the manufacturers up dating their vaccines to meet the OICE recommendations.

MAF Response: MAF will grant equivalence in the guidance document noting approval for the use of those vaccines containing previous strains recommended by the OIE Expert Surveillance Panel for equine influenza, until such time that an updated vaccine is commercially available.

- 2.5. (Transport 21 f. Treated wood shavings) Shavings are usual kiln dried which we assume if a form of treatment acceptable to NZMAF.

MAF Response: MAF accepts kiln dried shavings as a suitable form of treatment as the wood shavings must be disposed of on arrival according to the *Standard for General Transitional Facilities for Uncleared Goods (BNZ-STD-TFGEN)* and this has been referenced in the final IHS. This standard states all biosecurity risk refuse that comes from a “delivery container” (i.e. air stall or shipping container) must be disposed of through a MAFBNZ approved Biosecurity Refuse Facility. This standard has been referenced in the IHS.

- 2.6. (Transport 21 i. Sprayed with an effective residual insecticide spray) Airline security generally prevents the entry of aerosol sprays to airport aprons or onto aircraft.

MAF Response: MAF and the Ministry of Health require aircraft to be "disinsected" for invertebrates that may be pests or vectors of animal, plant or human disease. Surveys have conclusively shown that international aircraft present a pathway for hitch-hiking invertebrates. Australia and New Zealand have a joint procedure for the disinsection of aircraft arriving from overseas. MAF expects that a current certificate of treatment is available for inspection if required according to the [AQIS/MAFBNZ Schedule of Aircraft Disinsection Procedures](#).

- 2.7. (Additional; 24 Free from evidence of contamination with ticks and seeds) Hay, which by definition includes seeds, is the feed of choice for flights of a long duration. Feeding grain or pellets would be a health risk.

MAF Response: MAF agrees that the feeding of hay is acceptable and that this hay may contain seeds. MAF will amend the wording of the standard. MAF expects that all feed is disposed of on arrival according to the *MAF standard for General Transitional Facilities for Uncleared Goods Annex O (BNZ-STD-TFGEN)* and all biosecurity risk refuse must be disposed of through a MAFBNZ approved Biosecurity Refuse Facility.

- 2.8. (Part C 26. Equine Piroplasmiasis) Refer general comment in regard to tests require at foot of this document.

MAF Response: Noted

- 2.9. (Part C 28. CEM) Collection of an endometrial swab from prepubertal fillies is not recommended by veterinarians so we suggest the age limit be set for the endometrial swab requirement for fillies at 18 months & over.

MAF Response: The wording for the standard has been amended to allow pre-pubertal fillies to be imported into New Zealand if they are accompanied by equivalent CEM testing of their dam.

- 2.10. (Part C 28. CEM) The requirements indicate CEM swabbing should occur in the 30 days prior to the start of PEQ. Collecting swabs when horses are not in IRT's care & likely scattered over a large area is a substantial logistical challenge likely to result in some horses missing flights. Collection by a single well regarded vet clinic with the horses centrally located is guaranteed to provide a better outcome & more certainty for NZMAF that swabs were correctly gathered.

MAF Response: MAF notes an error in the wording of this section in the model veterinary certificate and the correct wording in 21 e. of the guidance document should state: "in the 30 days prior to export the horses were tested for CEM".

- 2.11. (Part C 28. CEM) The OIE Code Chapter provides no details whatsoever concerning sites to be sampled in stallions, colts, mares, fillies or the frequency or interval between swab collections. The OIE Diagnostic Standards Manual provides limited information on the interval between consecutive sets of swabs from stallions which it states should be obtained no fewer than 7 days apart. Other sources of information on the interval between swabbing and is the HBLB Code of Practice which recommends an interval of at least 7 days with respect to swabbing of "high-risk" mares. The USDA Review of CEM (2007), recommends that the interval between each set of swabs from imported mares be not less than 3 days apart, with the 3 sets of swabs collected in a 12 or more day period. In summary, the interval of 7 days plus between swabbings can be traced back to the original recommendation promulgated in the late 1970s and that is probably what Australian and New Zealand Ministries have taken as their yardstick. There is no controlled scientific evidence however, that would support or refute reducing the sampling interval to less than 7 days.

MAF Response: The OIE Code recommends that horses are subject to the laboratory test for CEM. The details of testing with reference to the widely adopted UK's HBLB Code of Practice is made in the OIE Code. MAF's recommended tests will remain as the internationally prescribed swabbing to identify the agent of CEM and this has been based on the HBLB Code of Practice. The timing of the swabs is in alignment with the recommendations of: the internationally prescribed agent identification test,

particularly that swabbing should not be taken until at least 7 days after antibiotic treatment has stopped; and the HBLB Code of practice, with an interval of 7 days between swabs.

- 2.12. (Part C 29. Dourine & Glanders country of residence certification) OV's in the EU & we think in the USA are unable to certify freedom from these disease outside their country or in the case of the EU outside their country & the member states. We suggest the following wording is adopted to overcome this - 'After due enquiry, during the 180 days/6 months immediately prior to export, or since birth if under 6 months of age, the said horse will be continuously resident in one or more of the Member States of the EU or other country where no clinical, epidemiological or evidence of glanders or Dourine has occurred during the previous three years and where the disease was compulsorily notifiable and said horse free of quarantine restrictions". Exact wording to be adjusted depending on country of export.

MAF Response: MAF will negotiate the exact wording of the veterinary certificate with the EU and USA at the time of bilateral negotiations.

- 2.13. (Part C 30. Treatment for Ectoparasites 48 hours prior to entering PEI) Generally horses are not in IRT's care until the start of PEI. Treatment within 48 hrs of the commencement of PEI when all the horses are in IRT's care is logistically more practical and should provide a more uniform process as the same vet would carry out the treatment.

MAF Response: MAF agrees and will amend the wording accordingly.

- 2.14. (Part C 31. Treatment for Endoparasites 48 hours prior to entering PEI) As for Part 30. above.

MAF Response: MAF agrees and will amend the wording accordingly.

- 2.15. (Part C 36. & Part C 36 a. Showing no clinical signs of EVA during the 28 days before export/Were isolated for 28 days and tested negative for EVA) The guidance notes page 3 indicate a PEI ex EU & USA of a minimum of 21 days. These requirements indicate the need for a 28 day PEI & appear to contradict the thrust of the draft which is to require a 21 days PEI.

MAF Response: Noted, MAF will amend the documents to consistently require 21 days PEI.

- 2.16. (Part C 36. EVA Testing) For sero negative horses the conditions require a single negative test for stallions and two negative tests for colts, female horses & geldings. This appears contradictory. Also if this clause is to remain as it then 'stallion' needs to be defined.

MAF Response: Please see response to 3.6. MAF will amend the error made by omitting the provisions for the horses other than uncastrated males to have one negative serological test for EVA.

- 2.17. (Part C 36. EVA Testing – Gelding) Why is there now a need to test for geldings ?

MAF Response: Please see response to 3.6.

- 2.18. (Part C 36. Stable or declining titre) A definition of this should be included in the conditions.

MAF Response: MAF expectations of a stable or declining titre has been explained in the guidance document.

- 2.19. (Part C 36. Vaccinated Shuttle Stallions with imperfect records) We will continue to provide NZMAF with the records of imperfectly vaccinated stallions for possible CofE issuance. However, we read the conditions to allow a non conforming vaccinated male horse to

become conforming if his semen is VI tested negative twice & he is vaccinated on the day semen was collected and is regular vaccinated thereafter to confirm with the vaccine manufacturers recommendation. Is that right ??

MAF Response: MAF will amend the EVA clauses in the guidance document to reflect the OIE Code.

- 2.20. (Part C 41. Vaccination against WNV with a MAF approved inactivate vaccine) Why MAF approved?

MAF Response: MAF agrees to remove the wording “a MAF approved” and replace with “an effective inactivated vaccine”.

- 2.21. There seems to be an over reliance on determining the conditions by having to cross reference between the Import Health Standard & Guidance Document. When the conditions are completed it would appear more helpful to IRT if the Health Standard spelt out the extra vaccinations & individual tests required so the data was in one document. This should avoid any confusion that might come about whilst referring to two documents.

MAF Response: MAF understands that during the consultation period there may be a requirement to refer to both the import health standard and the guidance document, with references to the general information and risk management proposal. Once the import health standard is issued and negotiations are finalised with MAF approved countries, all importers will refer to the veterinary certificate for each approved country, this has been located in the guidance document and has been available for easy access on the website. The vaccinations and tests required will be included in the individual approved country’s veterinary certificate.

- 2.22. (Part E. Appendix 1.5) PEI premises must be within 240Kms of the port of embarkation. With PEI completed in Newmarket, UK this works, however, where PEQ is completed in Kentucky & export is from Chicago this condition cannot be made with the continuance of NZMAF issuing CofEs

MAF Response: MAF will amend the clause to enable the Veterinary Authority to determine how the biosecurity and welfare expectations will be managed en route to the port of departure. Beneath the clause, MAF’s welfare considerations have been noted.

- 2.23. (Part E. Appendix 1.8) The PEI must be located at least 100 metres from other horses. We note this will be reduced to 35 metres in accordance with the risk analysis completed by NZMAF

MAF Response: MAF agrees to make the clause outcome focussed and reliant on Veterinary Authority oversight.

- 2.24. (Part E. Appendix 1.9) The PEI must be located at least 100 metres from domestic animals, including measures to prevent access to the facility by wild animals. We take this to mean that vermin is controlled & that property is fenced for horses.

MAF Response: MAF agrees that this is the intended meaning of clause 9, Appendix 1 of the IHS. Please see response to 1.14.

- 2.25. (Part E. Appendix 1.14 Management 21.) Adequate showering facilities. It is unlikely farm stables will contain a shower and piped hot water. A process of staff showering at home each morning, donning clean laundered clothing and having no contact with horses or horse equipment between showering & reaching the PEI should be adopted.

MAF Response: Please see response to 4.24 and 6.5.

- 2.26. (Part E. Management 22) Vector Protection. We assume this requires spray with a long action residual insecticide prior departure from PEI and is already met by Inspection & Treatment 43 b.

MAF Response: MAF will include the expectations of “vector protection” and “vector-proof” in the guidance document and will also clarify by way of definitions in the import health standard.

- 2.27. (Part E. Management 24) The veterinary clinician employed by the premises must record in a register all visits & activities... We assume this means all 'his' visits.

MAF Response: MAF notes that this clause is actually clause 25 of Appendix 1. MAF agrees that this refers to the veterinary clinicians' visits and not “all visits”. MAF will amend the wording of this clause.

- 2.28. (Part E. Operation 32) All equipment used for horses in the consignment must be specific to one horse etc. Since there is a policy of all in all is this necessary ??

MAF Response: MAF agrees to remove this clause.

- 2.29. (Part E. Operation 35) Straw & Hay must not be used. Whilst shaving are generally used on occasions we may have a horse allergic to shaving so straw is used. Can straw be included as bedding ?

MAF Response: MAF will allow the use of straw as bedding as all bedding, feed and waste must be appropriately disposed/destroyed on arrival to manage any biosecurity risk. Please see response to 2.7.

- 2.30. Part E. Duration 36 b. VS minimum 30 days PEI protected from insect vectors. We understand this to mean if PEI is occurring in a zone where VS is active, however, not in zones where VS is not active. This needs to be clarified with regard to imports from North America.

MAF Response: MAF will discuss the ecology of vector populations with the Veterinary Authority at the time of negotiations of the veterinary/export certificate and USA will need to re-state their zoning programme for VS.

- 2.31. Part E. 38. Vector Protection & vector proof facilities. Clarification is required with regard to NZMAF's requirements for vector proofing when transiting ports like Singapore.

MAF Response: MAF directs the submitter to the following standard: *Import Health Standard for the Importation of Livestock into New Zealand by Air Routes Transiting Countries Where Health Risks Associated with insect Borne Pathogens Exist.*

- 2.32. Diagnostic tests required 47. This appears covered in 33 b. and could be said to contradict 33 b. where two tests are required.

MAF Response: The PCR testing requirements for pre-export isolation (PEI) are included in clause 33b. The post-arrival quarantine (PAQ) testing requirements for EI are stated in clause 47 of Appendix 2.

3. Australia AQIS and Biosecurity Australia

Draft Import Health Standard for Horses:

- 3.1. 1. Page 4 (point 8) and page 7 (point 26) equine herpesvirus 1 (EHV-1). We suggest that, in line with the Draft Guidance Document (page 10, point 35), the disease is listed with the strains specified i.e. 'Equine herpesvirus 1 (abortigenic and paralytic forms)'.

MAF Response: MAF Agrees to maintain consistency with the OIE Code and reference consistency between documents in the model veterinary certificate.

Draft Guidance Document:

- 3.2. 2. Page 4 Tick examination requires that the inspection be done' ... under the supervision of the Official Veterinarian'. In both the Draft Import Health Standard for Horses (page 8, point 30) and the current Import Health Standard for Horses from Australia (point 7.1) the examination for ticks is conducted by a registered veterinarian. We request that the Draft Guidance Document includes an option for tick inspection to be done by a registered veterinarian.

MAF Response: MAF agrees to negotiate such changes as equivalent measures based on the knowledge of the Australian veterinary system in the country approved veterinary certificate. "Under supervision" means the Veterinary Authority have some control over how the inspection is carried out and who is authorised to do so, but their presence at the inspection is not required. "Under direct supervision" means the official Veterinarian must be present when the inspection takes place.

- 3.3. 3. Page 5 Model Veterinary Certificate requires 'For pregnant mares the name of the sire' to be stated. For clarity we suggest addition of the words '... to which the mare is pregnant'.

MAF Response: MAF will clarify the clause as suggested.

- 3.4. 4. Page 10 For equine influenza (EI) (point 31 b) requires that '... vaccination for EI is not practised in the country of export'. Vaccination of Australian horses in the general population is not practised. Australia will certify to this, as EI vaccine is only registered for use, if required, for export purposes.

MAF Response: MAF has amended the EI clause in the final documents to reflect the current OIE Code.

- 3.5. 5. Page 10 For equine piroplasmiasis (point 33) requires that '... the horses were kept for at least the past 30 days in a country that does not import seropositive horses ... '. Please note: a. Australia does not permanently import horses that test positive for equine piroplasmiasis and therefore will certify to this clause. b. Horses that test serologically positive for equine piroplasmiasis may be permitted temporary importation to Australia under strict additional quarantine measures. These measures include requirements for the horses to be clearly identified, remain in quarantine and not enter the horse population in Australia, be managed under quarantine surveillance and be exported within ten days of completion of the event for which they were imported. There are also requirements that restrict access to seropositive horses and for approval of quarantine facilities and competition sites.

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 3.6. 6. Page 11 For equine viral arteritis (point 36,37) it is not clear whether young male horses over 6 months age are to be imported under the conditions for 'stallions' or 'fillies, mares, colts and geldings'. We suggest that the sub-headings reflect OIE terminology (i.e. 'For uncastrated male horses:' and 'For horses other than uncastrated males:') or that age is specified (e.g. over 6 months).

MAF Response: MAF agrees and this has been changed in the final documents.

- 3.7. 7. We also note that the Draft Guidance Document does not specify conditions for New Zealand horses that visit, for up to 21 days, a third country for competition and then return to New Zealand, i.e. 'returning horses'. However, we note that the Draft Risk Management Proposal: Horses document addresses this issue. We therefore recognise that preparation of the Import Health Standard for Horses from Australia will take into account New Zealand horses competing in Australia and then returning to New Zealand.

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

4. Hong Kong AFCD

Draft Risk Management Proposal: Horses

- 4.1. AFCD supports the removal of leptospirosis measures.

MAF Response: Noted

- 4.2. AFCD does not support that AHS measures should be in place if there is no vector in New Zealand and no means of local spread, although this is not in compliance with the Code it is in the spirit of the OIE Code. As MAF is well aware the OIE Code is a general set of recommendations agreed to by many countries and does not seem to take into account the case for vector freedom when importing. This would be consistent with MAF's current policy established in the IHS for dogs and cats where if the vector is considered not to be present in New Zealand then no measures are taken (e.g. for non-South African *Babesia canis* strains). AFCD suggests that if the OIE Code recommendations are adopted then all OIE options for AHS are adopted.

MAF Response: Although AHS is not deemed a biosecurity threat the OIE Code makes it clear that for a country to maintain its free status the OIE Code measures need to be adopted. Therefore New Zealand has adopted the OIE Code recommendations in regards to AHS.

- 4.3. The final veterinary inspection 24 hours prior to export is extremely problematic for AFCD due to very limited AFCD veterinary resources. AFCD would kindly request that the final tick/vet inspection can be done within 48 hours prior to export. AFCD has never found any ticks present on the horses that have been examined for export in the past 2 years. All horses at Hong Kong Jockey Club (HKJC) are regularly treated with ectoparasitides and inspected daily by their grooms for ticks. The HKJC has an active surveillance programme for ticks and has not found any since commencement of the surveillance programme in 2000. In their passive surveillance programme, 2 undetermined ticks were detected at one of HKJC's riding schools in 2007. AFCD is confident that extension of the inspection from 24 to 48 hours prior to export will not significantly increase the risk of New Zealand importing horses with ticks from Hong Kong as the risk is already negligible. In terms of

fitness to travel and health of the horse, HKJC veterinarians inspect the horses prior to export and a veterinarian accompanies the horses to the airport immediately prior to departure. If any signs of ill health are detected the affected horse/horses will be removed immediately. AFCD has the utmost confidence in the veterinary services provided by HKJC and feels that our inspection within 48 hours rather than within 24 hours will not result in any increased risk of an animal not fit to travel being exported.

MAF Response: MAF agrees that in this instance the HKJC has provided adequate information to allow for such an extension to be granted as equivalent and this will be implemented in the final negotiated veterinary/export certificate.

- 4.4. AFCD requests that the same import requirements for EIA that are applied to Australia are applied to Hong Kong. The basis for this request is that Hong Kong is also free from EIA and that this is in line with the WTO principles of trade without discrimination and no most-favoured-nation treatment. The equine population of Hong Kong is the most intensively managed equine populations in the world. On the 1 April 2010 it consisted of 1821 horses with the majority being horses in training at the Sha Tin Racecourse (1261 horses), the four HKJC riding schools (369 horses) and then a further eight private riding schools (with 153 horses and 2 mules). There are no other equines in Hong Kong. The HKJC is responsible for all veterinary care for equines in Hong Kong. There is no breeding population of horses in Hong Kong and the only new additions of horses in Hong Kong are via importation. There is no wild population of Equidae in Hong Kong. All premises that hold horses are licensed by AFCD and inspected at least quarterly. EIA is a notifiable disease under Cap. 139 Public Health (Animals and Birds) Ordinance and subsequent gazettes issued under this Ordinance. EIA has been notifiable since 1977. Hong Kong's import requirements for EIA are that all horses must be tested negative using the immunodiffusion (Coggins) test. In addition to the requirements above the HKJC also test all recently imported horses for EIA. The table below reflects the number of animals that have been tested over the past 4 years. This testing includes all post-import, pre-export and testing to rule out suspicion of disease. All the testing has not shown disease as reported to the OIE.

	2010	2009	2008	2007
EIA (AGID)	101	159	264	204

MAF Response: MAF is reviewing the EIA requirements for Australia in line with the current IHS. All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 4.5. AFCD is aware that currently there are no commercially available vaccines available that have the strains of EI virus as recommended by the OIE expert surveillance panel. In discussions with Dr Richard Newton (Head of Epidemiology and Disease Surveillance at the Animal Health Trust) and Dr Debra Elton (Animal Health Trusts's OIE recognised equine influenza virus expert) it was concluded that the current Resequin EI vaccine (which is used in Hong Kong) at least appears to offer effective cross-protection against the current clade 1 and clade 2 strains circulating worldwide on the basis that there is no evidence to date that there has been major vaccine failure with this vaccine. AFCD requests that this clause is amended to reflect that no commercially available vaccines contain the EI strains as recommended by the OIE panel and if MAF can confirm that use of the Resequin EI vaccine (as approved by AQIS) is acceptable?

MAF Response: MAF agrees to amend the clause as it would be unable to be met as it currently stands.

- 4.6. AFCD requests that recognition be given for Hong Kong's freedom from equine piroplasmosis. As mentioned in our point 3 [4.3. of this ROS] above, HKJC ensure that the equine population is not exposed to any vectors and no vectors have been found recently in the extremely well controlled equine population. Equine piroplasmosis is a notifiable disease under Cap. 139 Public Health (Animals and Birds) Ordinance and subsequent gazettes issued under this Ordinance. Equine piroplasmosis has been notifiable since 1995. The import requirements for equine piroplasmosis are either that the exporting country certifies freedom from equine piroplasmosis for the past 2 years, or the equine must be tested with the indirect fluorescent antibody test (IFAT). All equines must be treated with an ectoparasiticide as well as thoroughly examined for ticks. AFCD must be informed if any ticks are found. In addition to the requirements above the HKJC also test all recently imported horses for equine piroplasmosis. The table below reflects the number of animals that have been tested for equine piroplasmosis over the past 4 years. This testing includes all post-import, pre-export and testing to rule out suspicion of disease. All testing has not shown disease as reported to the OIE.

	2010	2009	2008	2007
Piro (IFAT)	621	879	821	630
Piro(Elisa)	2	3	0	0

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 4.7. Hong Kong is not free of *Chrysomya bezziana*. Please amend this section to reflect this.

MAF Response: Noted and the section has been amended accordingly.

- 4.8. If WNV would occur in Hong Kong AFCD would find it extremely problematic to find a vaccine for WNV. The OIE does not list any measures for WNV to be in place for the trade in equines, accordingly AFCD recommends that MAF adopt the recommendations of the OIE and no measures are put in place for WNV. If measures are put in place then a risk assessment detailing the justification should be done as per the OIE recommendations for measures that are higher than that of the OIE Code. Nevertheless, if MAF still insists on measures for WNV to be put in place then AFCD requests that MAF addresses the issue of a the lack of availability of vaccine in recently infected countries.

MAF Response: Please see the MAF RMP for justification of the measures for WNF. If Hong Kong were to become endemically infected the lack of available vaccine would be addressed at that time.

Import Health Standard for Horses

- 4.9. Point 20 (c), see our point 5 [4.5. of this ROS] above.

MAF Response: Please see response to 4.5.

- 4.10. Point 21(e), as the veterinary certificate is issued sometime before the consignment departs it is prior to the containers being cleaned, disinfected and treated with a residual insecticide. It is recommended that this forms part of an additional certificate that is provided by AFCD staff who have first-hand knowledge of this occurring rather than by the certifying veterinarian in advance of the event occurring.

MAF Response: MAF would allow the provision of a treatment certificate to accompany the consignment in accordance with the [AQIS/MAFBNZ Schedule of Aircraft Disinsection Procedures](#). The IHS has been amended to incorporate this as an allowance.

- 4.11. Point 21 (g), AFCD objects to this requirement. AFCD is not aware of any disease that transmitted to horses by aerosol from other species. AFCD kindly requests that MAF provide justification for this measure. Furthermore, the certifying veterinarian cannot know if the aircraft will have other animals on board until the time immediately before the consignment is loaded onto the aircraft, so the same issue as in our point 10 arises. AFCD would suggest that if MAF insists on this measure then it is in the form of a declaration that comes from the airline company which is separate to AFCD certification.

MAF Response: This requirement has always been part of MAF policy for all flights carrying animals. Equivalent tested health status animals are acceptable i.e. the animals on board must all meet the relevant New Zealand import health standard for that species.

- 4.12. Point 21 (i), as mentioned previously this occurs after the veterinary certificate has been signed. AFCD requests that a declaration is obtained by the airline to state that this measure has been implemented.

MAF Response: See response 4.10.

- 4.13. Point 23, as mentioned in our point 3 [4.3. of this ROS] above.

MAF Response: Please see response 4.3.

- 4.14. Point 24, the horses exported from Hong Kong are exported with Timothy hay which does contain seeds (see attached photo with seed circled). This hay has not been fumigated or irradiated so AFCD believes it may be viable seed. AFCD suggests that the feed is disposed of in New Zealand. AFCD does not suggest that the feed is changed as this increases the risk of colic.

MAF Response: MAF agrees that hay is a suitable feed for horses being transported to minimise transport disorders such as colic. Hay is acceptable since all feed and waste will be managed by disposal as biosecurity waste on arrival. Please see response 2.5. and 2.7.

- 4.15. Point 26, if testing is still required AFCD would kindly request that the sampling for EIA, equine piroplasmosis and EVA can be done within 21 days rather than within PEQ. As Hong Kong is free from EIA, equine piroplasmosis and EVA the risks posed within or prior to entry into PEQ are negligible.

MAF Response: MAF agrees appropriate testing must be done within the 21 days prior to export (which is the pre-export isolation period) the IHS has been amended to allow this from all approved countries.

- 4.16. Point 28 (c), AFCD would kindly request that the previous recognition that no breeding occurs in Hong Kong and allowance be give that if a horse originates from New Zealand or Australia, and has only been in Hong Kong since importation from these countries, then testing is not required for CEM.

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 4.17. Pont 30 (a), as mentioned in our point 3 [4.3. of this ROS] above.

MAF Response: Please see response 4.3.

- 4.18. Point 31, AFCD recommends that deworming be done within 7 days due to the possible risk of horses having colic in flight. This is not a problem for AFCD as the HK horses are extremely well managed and endoparasite burdens are extremely low.

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 4.19. Point 33 (a), the OIE Code does not state that the country cannot vaccinate. AFCD would again recommend that MAF adopt the recommendations of the OIE and no restriction is put in place for vaccination against EI. If measures are put in place then a risk assessment detailing the justification should be done as per the OIE recommendations for measures that are higher than that of the OIE Code.

MAF Response: MAF has modified the clause in the final IHS to reflect the OIE Code. New Zealand accepts the OIE Code criteria for country freedom, but will require a high degree of confidence in freedom claims, particularly where vaccination for EI is practised in the general population.

- 4.20. Point 33(b), In the last sentence "not more that 5 days later" should be "not more than 5 days later". AFCD would suggest that the PEI is 14 days as adopted by Australia and detailed in their Import Risk Analysis Report for Horses from Approved Countries rather than the recommendations of the OIE Code as the assessment conducted by Australia addresses the EI issue is far more detailed and current than the general OIE recommendations. This would also mean some consistency for export to EI free countries (NZ and Australia) that essentially allow unrestricted moved between one another. AFCD would also kindly request consideration be given to the "pen-side" tests for EI such as the Directigen and Espline test kits. Further information on the sensitivity and specificity for these tests can be provided.

MAF Response: New Zealand's acceptable level of protection requires 21 days pre-export isolation and is aligned with the OIE Code requirement. All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate. To assess these tests the sensitivity and specificity must be provided and MAF laboratory specialists will provide assessment and guidance to MAF animal imports. MAF will correct the grammatical error at clause 33b.

- 4.21. Appendixes point 8. Hong Kong cannot comply with 100m separation due to limited space available. The location of the quarantine stables is immediately adjacent to the 1000m track. This track is used during race meetings (once a week for a period of approximately 15 minutes) and barrier trials (once a fortnight from 7am to 8:30am). There is infrequent movement of horses (within enclosed vehicles only) along the road immediately adjacent to the quarantine stables. In addition to this New Zealand PEI has normally been in stables 20m from the adjacent stables (stable door to stable door) with horses moving to exercise

areas during which they are 4.5m from the entrance to another stable. These stable doors are normally kept closed but the ventilation intake from one stable is 7m from the exhaust from the adjacent stable. The distance a particle would have to travel from one horse in a stable to another in an adjacent stable is about 15m via the ventilation system. AFCD would like to explain HK's status regarding EI. All imported horses are tested for EI using the Espline/Directigen/PCR test prior to departure. All horses are then tested after arrival in HK with the Espline test. All horses in HK are temperature checked twice a day. Any horses in HK with signs or pyrexia or respiratory disease are tested with the Espline test. Permanently imported horses must have 21 days pre-export quarantine (PEQ) prior to import. PEQ can only occur at AFCD/HKJC approved facilities. All permanently imported horses are tested after arrival in HK and spend 14 days in post arrival quarantine. All temporary horses are tested within 48 hours of export and upon importation; they are kept separate from the rest of the Hong Kong local horse population. Hong Kong has not had a case of EI since the outbreak in 1992. All horses must be fully vaccinated prior to import (excluding NZ and Australian imports but this may change) and are vaccinated in HK every 6 months. HK is free of EI on the basis of strict import requirements, pre-import testing, ensuring all imports are adequately vaccinated, strict post-arrival quarantine, post-arrival testing, regular vaccination of the local population, and intensive active and passive surveillance of the local population. Below is the testing for the past 3 years. AFCD would kindly request the following:

- that allowance be given for the use of the 1000m track as it is only for very short periods of time and HKJC will ensure that NZ PEI horses are kept indoors for this period of time and that the stable doors are shut during this time and for 1 hour after the horses have used the 1000m track
- that allowance is given for use of the road besides the PEI to transport horses as these horses will be in enclosed vehicles
- that the distance between other horses be reduced to 30m in order to allow other surrounding stables to be used due to severe shortage of space available in HK
- that horses be allowed to be temporarily moved within 4.5m of the entrance to a stable with other horses so that the NZ PEI horses can have access to a trotting ring, horse walker and the track. HKJC will ensure that the stable doors to these neighbouring stables are kept shut during the movement of the NZ PEI horses.

	2010	2009	2008
PCR Flu A (by AFCD)	232	292	271
Espline (by HKJC)	1681	1758	1648

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate. The distance between other horses will not be stipulated in the final standard and an outcome focussed measure reliant on direct Veterinary Authority supervision has been included in the final standard.

- 4.22. Appendixes point 9. Please see our point 11 [4.11. of this ROS]. AFCD is not aware of any disease that transmitted to horses by aerosol from other species. At HKJC there is a local population of managed feral cats that will be within 100m and many people walk their dogs on the road on the far end of the 1000m track so these animals can come within the 100m. AFCD kindly requests that this requirement is removed.

MAF Response: As a result of a number of submissions, MAF agrees to modify this clause.

- 4.23. Appendixes point 16. HKJC do have a financial interest in the horses undergoing isolation but AFCD has the utmost of confidence in the management of the PEQ by HKJC and all the staff employed by HKJC. There are no other facilities available in HK and the operator cannot change. AFCD requests that this requirement is removed.

MAF Response: MAF agrees to remove the clauses from the standard.

- 4.24. Appendixes point 20. AFCD kindly request that allowance be given to staff and other visitors to the PEI if it is their first visit of the day and if they have not been in contact with horses since last showering. This has been agreed between HK and AQIS and we would like to harmonise the requirements for easy of staff understanding and implementation.

MAF Response: MAF agrees and this has been included as an option in the IHS.

- 4.25. Appendixes point 27. Please see our point 3 [4.3. of this ROS] and point 14 [4.14. of this ROS].

MAF Response: Please see response 4.3. and 4.14.

- 4.26. Appendixes point 36(a). Please see our point 20 [4.20. of this ROS]. AFCD would kindly request that PEI is reduced to 14 days.

MAF Response: Please see response 4.20.

- 4.27. Appendixes point 37. As mentioned previously AFCD have very limited veterinary resources so AFCD will delegate this function to the HKJC veterinarian to carry out.

MAF Response: MAF agrees to negotiate such changes as equivalent measures based on the knowledge of the Hong Kong veterinary system in the country approved veterinary certificate. “Under supervision” means the Veterinary Authority have some control over how the inspection is carried out and who is authorised to do so, but their presence at the inspection is not required. “Under direct supervision” means the official Veterinarian must be present when the inspection takes place.

Guidance document Horse Import Health Standard

- 4.28. Model Veterinary Certificate, first point. AFCD would like to clarify that if a horse is microchipped or has a unique brand (as for all HK resident horses) then the certification will only need to include these unique identifiers and no silhouette is required.

MAF Response: MAF agrees in the instance where the horse is micro chipped it must be imported with an appropriate microchip reader, or confirmation obtained from MAF verification prior to import that the microchip can be read with a universal reader. The brand must be visible in its entirety to omit the requirement for a silhouette.

- 4.29. Model Veterinary Certificate, fifth point. AFCD would like to continue with the current practice of having multiple horses per certificate as this creates less opportunity for error by AFCD, is less pieces of paper work so the potential for loss of documentation is minimised, is more environmentally friendly and is easier to check by the port veterinarian in New Zealand. Please can you confirm if we can continue with this previous practice?

MAF Response: MAF agrees previous practice is suitable and is easier for the port veterinarian.

- 4.30. Model Veterinary Certificate, sixth point. The vaccination certificates for many horses is part of the passport and normally AFCD does not endorse this, will AFCD be required to endorse

the passport or can a separate annex be attached to the veterinary certificate listing the most recent vaccinations which will be signed, dated and stamped by the official veterinarian?

MAF Response: MAF will accept a separate annex which states the most recent vaccinations and certified by the Official Veterinarian.

- 4.31. Model Veterinary Certificate, eighth to twelfth point. The Model Veterinary Certificate does not contain any parts for completion of these specific details, please can they be included. For the eleventh and twelfth points (if applicable to the aircraft) please refer to our points 10 [4.10. of this ROS] and 12 [4.12. of this ROS].

MAF Response: The negotiated veterinary certificate/export certificate will include parts for completion related to these specific points.

- 4.32. Model Veterinary Certificate, fourteenth point. AFCD does not normally apply a seal to containers as there is no risk for substitution of these animals in Hong Kong or en route as they have been uniquely identified. Furthermore, the possibility of these consignments being released in a third country en route to New Zealand is highly unlikely as these consignments are extremely difficult to offload and then put into a stable and then reload, and this will appear on the flight details, and this will have to be sanctioned by the third country which is highly unlikely to occur. AFCD questions the rationale of this requirement and would like justification if it is required.

MAF Response: MAF agrees and this requirement should be removed from the model veterinary certificate.

- 4.33. Part I: Details of the dispatched consignment, AFCD suggests that irrelevant parts of the document are omitted (i.e. "Game Restocking", "Re-entry", "Temporary Admission", "Category"). Many authorities are unaware of the correct HS Code so it recommended that this is already pre-filled. HS codes are a customs issue so it is questionable why this is need on a sanitary certificate.

MAF Response: MAF agrees and will omit the terms obtained from the OIE veterinary certificate template.

- 4.34. II.3, as mentioned in our point 3 [4.3. of this ROS].

MAF Response: Please see response to 4.3.

- 4.35. II.8, as mentioned in our point 27 [4.27. of this ROS] and this will also occur after the certificate has been signed so AFCD kindly requests that this is a separate certificate issued by HKJC.

MAF Response: Please see response to 4.27.

- 4.36. II.11, as mentioned in our point 14 [4.14. of this ROS].

MAF Response: Please see response to 4.14.

- 4.37. II.12-14, as mentioned in our points 10-12 [4.10. and 4.12. of this ROS].

MAF Response: Please see response to 4.10. and 4.12.

4.38. II.16-17, as mentioned in our point 2 [4.2. of this ROS].

MAF Response: Please see response 4.2.

4.39. II.16(b) and other points, the certificate requires AFCD to certify “on the day of export” this is different to 24 hours prior to shipment as it may be the day prior to export and in many cases flights leave in the early hours of the morning so this is not possible. AFCD recommends that it is changed to “at the time of inspection” to accurately reflect what the certifying veterinarian has carrying out.

MAF Response: MAF agrees and will amend the wording appropriately.

4.40. II.21 (b), HK does not have an official programme for CEM so cannot meet the requirements for II.20 nor II.21, AFCD would suggest that point 21(d) “if a horses does not meet requirement c. and d.” is extended to include requirement b. AFCD would also kindly request the CEM testing is exempt for horses that are NZ/Australia origin and have only been resident in Hong Kong as detailed in our point 16.

MAF Response: MAF will add the words “or a MAF-approved equivalent” and all equivalence (including the second part of AFCD’s question 4.40.) and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

4.41. II.24, as mentioned in our point 3 [4.3. of this ROS] and 18 [4.18. of this ROS].

MAF Response: Please see 4.3. and 4.18.

4.42. II.31, as mentioned in our point 19 [4.19. of this ROS] and point 20 [4.20. of this ROS].

MAF Response: Please see 4.19. and 4.20.

4.43. II.32 (c), please clarify what test is required as the OIE Manual only recommends the HI test. Will PCR and ‘pen-side’ rapid tests such as the Directigen and Espline be acceptable?

MAF Response: MAF allows the antigen test for EI and PCR is the preferred test. MAF will consider other antigen tests if there is proof that they are equivalent in sensitivity and specificity, and approved by MAF IDC. Note HI is a serological test and due to vaccination in the animals imported into New Zealand MAF does not accept this test.

4.44. II.36-38. In HK no EVA vaccination and breeding occurs. All imported horses must be sero-negative. AFCD would kindly request that the previous measures of only testing stallions remains.

MAF Response: MAF accepts this as a long-standing equivalence based on the population and movements of horses in Hong Kong.

4.45. As the risk is negligible of AFCD exporting infected animals this would not increase the risk for NZ imports. If testing of mares and geldings is still required AFCD would kindly request that only one test is required and in the unlikely event that the horse is seropositive (probably due to laboratory error) then a further test is required to demonstrate the horse has a stable or decreasing titre. As mares and geldings are only acutely infected and then clear infection, one test to determine the serological status will be sufficient, or if the animal is positive a further test to show that it is a decreasing or stable titre will show that it is not an acute infection for serologically positive animals. AFCD understands that

vaccination mainly occurs in stallions and not in mares/geldings. The table below reflects the number of animals that have been tested for EVA in Hong Kong over the past 4 years. This testing includes all post-import, pre-export and testing to rule out suspicion of disease. All the testing has not shown disease as reported to the OIE. Equine viral arteritis (EVA) is not a notifiable disease at this stage in HK.

	2010	2009	2008	2007
EVA (SNT)	38	116	133	52

MAF Response: MAF is reviewing the EIA requirements for Australia in line with current IHS. All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 4.46. II.41 and 46, AFCD would kindly request confirmation that MAF regards HK as being Hendra and Nipah free, which is in line to our reporting to OIE.

MAF Response: All equivalences and disease freedom claims will be assessed during country-country bilateral negotiations of the approved veterinary/export certificate.

- 4.47. II.49, there is no requirement in HK for notification for human infections of screwworm and medical reasons for sick leave is confidential so AFCD have no means to certify the human component to this requirement. Please can this part be amended?

MAF Response: MAF agrees to adopt the wording of the OIE Code recommendations in the guidance document.

- 4.48. II.61, as mentioned in our point 8 [4.8. of this ROS].

MAF Response: Please see response 4.8.

5. Canadian Food Inspection Authority (CFIA)

Specific Comments - Import Health Standards for horses

- 5.1. Part B. GENERAL REQUIREMENTS - Article 11: The proposed New Zealand import requirements indicate that laboratory reports (or copies thereof) must accompany the horses. In Canada, the laboratory results are the property of the exporter and therefore Canada does not provide them to the importing country. Instead, the results of these tests are inserted into a chart in the body of the health certificate which is endorsed by the official veterinarian in charge of the export shipment. Canada would ask that New Zealand allow this method of laboratory result endorsement by Canada.

MAF Response: MAF agrees this method will be negotiated with approved countries at the time of veterinary certificate negotiation as an equivalent method of providing laboratory results.

- 5.2. Part E. APPENDICES Appendix 1: The proposed New Zealand requirement that necessitates the pre-export isolation (PEI) to be within 240 km of the port of embarkation will be difficult in some situations for the export of Canadian horses. Due to the geographic size of Canada and the limited number of airports that can accommodate the export of live animals, the distance could be greater than 240 km from the PEI. Considering that the health status of horses across Canada is uniform, there is no additional benefit to limiting the distance

between the PEI and the airport to 240 km. In addition, the vehicle of transport will be sealed prior to leaving the PEL. The transport of animals in Canada is regulated through the Canadian Health of Animals Regulations. The section titled Transportation of . . . 12 Animals regulates the transportation of animals as follows: Section 148 (1) states: subject to subsection (2), (3), and (7), no person shall confine in a railway car, motor vehicle, aircraft or vessel (a) equines, swine or other monogastric animals for longer than 36 hours; subsection (7) states that subsection (1) does not apply to animals if (a) the railway car, motor vehicle, aircraft or vessel is suitably equipped to feed, water and rest the animals; and (b) the animals are fed, watered and rested at intervals of not more than 48 hours in the case of ruminants and not more than 36 hours in the case of monogastric animals. Therefore, Canada would ask that the limitation of 240 km between PEI and the airport be removed for countries that have an equivalent health status throughout their country and have transport regulations to ensure the humane transport of these animals. Canada appreciates the opportunity to provide these comments, and requests that New Zealand advise as to how these comments will be taken into consideration in the final version of the Regulations. Canada looks forward to receiving a written response to the comments posed, and is available for any further discussions on the Regulations.

MAF Response: MAF will amend the clause to enable the Veterinary Authority to determine how the biosecurity and welfare expectations will be managed en route to the port of departure. Beneath the clause, MAF's welfare considerations have been noted.

6. USDA and APHIS

- 6.1. Regarding *Part B, point 11.c.* of the measure, it is unclear why laboratory reports must be included with equine health certificates. The recently notified import health standards for bovine semen and embryos (SPS NZL 440A) provide the option to include a tabulated summary of laboratory tests in lieu of the actual laboratory reports. APHIS requests that an option be provided to include a tabulated summary of laboratory tests for horse exports.

MAF Response: Please see response to 2.1.

- 6.2. Regarding *Part B, point 20.a.*, APHIS requests clarification about why all vaccinations must be administered not less than 35 days before export. This is not consistent with the World Organization for Animal Health (OIE) Terrestrial Animal Health Code guidelines. For example, Article 12.6.6, point 3 of the OIE Code for equine influenza states that horses should be vaccinated "between 21 and 90 days before shipment..." New Zealand's current IHS for horses requires equine influenza vaccination not less than 21 days before export. Similarly, Chapter 12.4 of the OIE Code for equine encephalomyelitis recommends that horses be "vaccinated not less than 15 days and not more than one year prior to shipment." New Zealand's current IHS follows the OIE guidelines and requires vaccination for equine encephalomyelitis not less than 15 days prior to export. We would appreciate receiving more information about the scientific basis for requiring all vaccinations to be administered not less than 35 days before export.

MAF Response: Current New Zealand import health standards require EI vaccinations be administered between 42 and 120 days prior to export. MAF has reduced this further in the new import health standard; MAF still requires a minimum of two weeks prior to entering the pre-export isolation facility for the vaccinated horse to establish adequate immunity. This means that 14 days was added to the 21 days pre-export isolation period totalling 35 days.

- 6.3. Regarding *Part E, point 3*, APHIS requests clarification under what circumstances would New Zealand's Ministry of Agriculture and Forestry (MAF) conduct an audit of pre-export isolation facilities and standard operating procedures from such facilities? Will an audit of all facilities be routinely required prior to approval of an export facility or SOP or only on a case-by-case basis?

MAF Response: MAF expects the Veterinary Authority to manage the approval and assessment of SOP's from pre-export isolation facilities in current approved countries. An audit may be required on a case-by-case basis from approved countries. New countries exporting horses to New Zealand may be subject to facility audits and assessments of SOP's prior to the first isolation of a consignment.

- 6.4. Regarding *Part E, point 9*, does the definition of "domestic animal" include pet dogs and cats or only horses and livestock?

MAF Response: Please see response to 1.14.

- 6.5. Regarding *Part E, points 14 and 21*, APHIS considers the requirement for a showering facility in an equine pre-export isolation facility to be excessive. The risk of introducing equine diseases into New Zealand from the export of horses from the United States is mitigated through adherence to strict biosecurity practices, vaccination and diagnostic testing, pre-export isolation, and post-arrival quarantine. We are unaware of any instances of transmission of equine diseases of concern to New Zealand from importation of U.S. horses following current IHS guidelines without a showering facility requirement.

MAF Response: MAF will provide an option for the staff to shower at home prior to entering the PEI, please see response to 4.24. MAF deems the risk of equine influenza too high not to implement this requirement as a biosecurity practise prior to entering pre-export isolation facilities.

- 6.6. *Point 24 of Part E* states that the "Official Veterinarian must visit the premises at least weekly." The current U.S. bilateral health certificate defines an Official Veterinarian as "...a specially appointed veterinarian, as authorized by the Veterinary Administration of the exporting country." This is equivalent to an accredited veterinarian in the United States, or the "veterinary clinician employed by the premises." In contrast, an APHIS veterinarian supervises the accredited veterinarian, approves the pre-export isolation facility prior to commencement of each consignment, and is present at the time of embarkation. The attending veterinarian (i.e., the Official Veterinarian) would likely visit the premises more than once a week depending on animal health circumstances. APHIS requests that the IHS clearly state that weekly inspections are to be conducted by the Official Veterinarian under the supervision of the competent authority.

MAF Response: MAF regards the Official Veterinarian as the Veterinary Authority Veterinarian, or in the case of the U.S., this would be the APHIS veterinarian, not the accredited veterinarian.

- 6.7. APHIS requests clarification of the term "temperature elevation" referred to in *point 34 of Part E*. What is MAF's definition of the normal range of equine temperatures taking into account exercise, environmental factors or other stressors? At what point would a temperature be considered truly elevated?

MAF Response: Please see response to 1.15.

- 6.8. Please provide additional information on what information may be requested regarding an exporting country's standards for vector-proofing a pre-export isolation facility as stated in *point 38 of Part E*. Under what circumstances would an official MAF audit be required?

MAF Response: Please see response to 6.3.

Appendix 1: copies of submissions

USDA and APHIS Comments

BEGIN COMMENTS:

The U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) appreciates the opportunity to provide comments on New Zealand's Draft import health standard (IHS) for horses, notified to the WTO as G/SPS/NZL/451.

We would like to offer the following specific comments:

Regarding *Part B, point 11.c.* of the measure, it is unclear why laboratory reports must be included with equine health certificates. The recently notified import health standards for bovine semen and embryos (SPS NZL 440A) provide the option to include a tabulated summary of laboratory tests in lieu of the actual laboratory reports. APHIS requests that an option be provided to include a tabulated summary of laboratory tests for horse exports.

Regarding *Part B, point 20.a.*, APHIS requests clarification about why all vaccinations must be administered not less than 35 days before export. This is not consistent with the World Organization for Animal Health (OIE) Terrestrial Animal Health Code guidelines. For example, Article 12.6.6, point 3 of the OIE Code for equine influenza states that horses should be vaccinated "between 21 and 90 days before shipment..." New Zealand's current IHS for horses requires equine influenza vaccination not less than 21 days before export. Similarly, Chapter 12.4 of the OIE Code for equine encephalomyelitis recommends that horses be "vaccinated not less than 15 days and not more than one year prior to shipment." New Zealand's current IHS follows the OIE guidelines and requires vaccination for equine encephalomyelitis not less than 15 days prior to export. We would appreciate receiving more information about the scientific basis for requiring all vaccinations to be administered not less than 35 days before export.

Regarding *Part E, point 3*, APHIS requests clarification under what circumstances would New Zealand's Ministry of Agriculture and Forestry (MAF) conduct an audit of pre-export isolation facilities and standard operating procedures from such facilities? Will an audit of all facilities be routinely required prior to approval of an export facility or SOP or only on a case-by-case basis?

Regarding *Part E, point 9*, does the definition of "domestic animal" include pet dogs and cats or only horses and livestock?

Regarding *Part E, points 14 and 21*, APHIS considers the requirement for a showering facility in an equine pre-export isolation facility to be excessive. The risk of introducing equine diseases into New Zealand from the export of horses from the United States is mitigated through adherence to strict biosecurity practices, vaccination and diagnostic testing, pre-export isolation, and post-arrival quarantine. We are unaware of any instances of transmission of equine diseases of concern to New Zealand from importation of U.S. horses following current IHS guidelines without a showering facility requirement.

Point 24 of Part E states that the “Official Veterinarian must visit the premises at least weekly.” The current U.S. bilateral health certificate defines an Official Veterinarian as “...a specially appointed veterinarian, as authorized by the Veterinary Administration of the exporting country.” This is equivalent to an accredited veterinarian in the United States, or the “veterinary clinician employed by the premises.” In contrast, an APHIS veterinarian supervises the accredited veterinarian, approves the pre-export isolation facility prior to commencement of each consignment, and is present at the time of embarkation. The attending veterinarian (i.e., the Official Veterinarian) would likely visit the premises more than once a week depending on animal health circumstances. APHIS requests that the IHS clearly state that weekly inspections are to be conducted by the Official Veterinarian under the supervision of the competent authority.

APHIS requests clarification of the term “temperature elevation” referred to in *point 34 of Part E*. What is MAF’s definition of the normal range of equine temperatures taking into account exercise, environmental factors or other stressors? At what point would a temperature be considered truly elevated?

Please provide additional information on what information may be requested regarding an exporting country’s standards for vector-proofing a pre-export isolation facility as stated in *point 38 of Part E*. Under what circumstances would an official MAF audit be required?

The United States thanks New Zealand for the opportunity to provide comments on this measure and hopes that these will be taken favorably into consideration.

END U.S. COMMENTS

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IRT Stakeholder Comments

Ref	Item	IRT comment
Documentation 11	Laboratory reports	Considering the OV signs the health certificate attesting to all the test results it seems 'overkill' to require copies of all the test results accompany the shipment
Documentation 12	Health documentation to be supplied to NZ Port Veterinarian at least one working day prior to the shipment arriving	In consequence of the sheer volume of paperwork involved we suggest a checklist showing details (results & dates) for all tests, treatments etc be provided to the port vet one day prior to arrival
Treatment 20 b.	Active Ingredient	To our knowledge vaccines do not have an active ingredient/s
Treatment 20 c.	Equivalent Strains of EI virus as recommended by the OIE	To our knowledge there is a lag, often substantial, between the recommendations of the OIE code and the manufacturers up dating their vaccines to meet the OICE recommendations.
Transport 21 f.	Treated wood shavings	Shavings are usually kiln dried which we assume is a form of treatment acceptable to NZMAF
Transport 21 i.	Sprayed with an effective residual insecticide spray	Airline security generally prevents the entry of aerosol sprays to airport aprons or onto aircraft
Additional 24	Free from evidence of contamination with ticks and seeds	Hay, which by definition includes seeds, is the feed of choice for flights of a long duration. Feeding grain or pellets would be a health risk
Part C 26.	Equine Piroplasmosis	Refer general comment in regard to tests require at foot of this document
Part C 28.	CEM	Collection of an endometrial swab from prepubertal fillies is not recommended by veterinarians so we suggest the age limit be set for the endometrial swab requirement for fillies at 18 months & over.

Part C 28.	CEM	<p>The requirements indicate CEM swabbing should occur in the 30 days prior to the start of PEQ. Collecting swabs when horses are not in IRT's care & likely scattered over a large area is a substantial logistical challenge likely to result in some horses missing flights. Collection by a single well regarded vet clinic with the horses centrally located is guaranteed to provide a better outcome & more certainty for NZMAF that swabs were correctly gathered</p>
Part C 28.	CEM	<p>The OIE Code Chapter provides no details whatsoever concerning sites to be sampled in stallions, colts, mares, fillies or the frequency or interval between swab collections. The OIE Diagnostic Standards Manual provides limited information on the interval between consecutive sets of swabs from stallions which it states should be obtained no fewer than 7 days apart. Other sources of information on the interval between swabbing and is the HBLB Code of Practice which recommends an interval of at least 7 days with respect to swabbing of "high-risk" mares. The USDA Review of CEM (2007), recommends that the interval between each set of swabs from imported mares be not less than 3 days apart, with the 3 sets of swabs collected in a 12 or more day period. In summary, the interval of 7 days plus between swabbings can be traced back to the original recommendation promulgated in the late 1970s and that is probably what Australian and New Zealand Ministries have taken as their yardstick. There is no controlled scientific evidence however, that would support or refute reducing the sampling interval to less than 7 days.</p>
Part C 28.	Dourine & Glanders country of residence certification	<p>OV's in the EU & we think in the USA are unable to certify freedom from these diseases outside their country or in the case of the EU outside their country & the member states. We suggest the following wording is adopted to overcome this - 'After due enquiry, during the 180 days/6 months immediately prior to export, or since birth if under 6 months of age, the said horse will be continuously resident in one or more of the Member States of the EU or other country where no clinical, epidemiological or evidence of glanders or Dourine has occurred during the previous three years and where the disease was compulsorily notifiable and said horse free of quarantine restrictions". Exact wording to be adjusted depending on country of export.</p>

Part C 29.	Dourine & Glanders country of residence certification	OV's in the EU & we think in the USA are unable to certify freedom from these disease outside their country or in the case of the EU outside their country & the member states. We suggest the following wording is adopted to overcome this - 'After due enquiry, during the 180 days/6 months immediately prior to export, or since birth if under 6 months of age, the said horse will be continuously resident in one or more of the Member States of the EU or other country where no clinical, epidemiological or evidence of glanders or Dourine has occurred during the previous three years and where the disease was compulsorily notifiable and said horse free of quarantine restrictions". Exact wording to be adjusted depending on country of export.
Part C 30.	Treatment for Ectoparasites 48 hours prior to entering PEI	Generally horses are not in IRT's care until the start of PEI. Treatment within 48 hrs of the commencement of PEI when all the horses are in IRT's care is logistically more practical and should provide a more uniform process as the same vet would carry out the treatment.
Part C 31	Treatment for Endoparasites 48 hours prior to entering PEI	As for Part 30. above
Part C 36. & Part C 36 a.	Showing no clinical signs of EVA during the 28 days before export/Were isolated for 28 days and tested negative for EVA	The guidance notes page 3 indicate a PEI ex EU & USA of a minimum of 21 days. These requirements indicate the need for a 28 day PEI & appear to contradict the thrust of the draft which is to require a 21 days PEI
Part C 36.	EVA Testing	For sero negative horses the conditions require a single negative test for stallions and two negative tests for colts, female horses & geldings. This appears contradictory. Also if this clause is to remain as it then 'stallion' needs to be defined
Part C 36.	EVA Testing - Gelding	Why is there now a need to test for geldings ?
Part C 36.	Stable or declining titre	A definition of this should be included in the conditions
Part C 36.	Vaccinated Shuttle Stallions with imperfect records	We will continue to provide NZMAF with the records of imperfectly vaccinated stallions for possible CofE issuance. However, we read the conditions to allow a non conforming vaccinated male horse to become conforming if his semen is VI tested negative twice & he is vaccinated on the day semen was collected and is regular vaccinated thereafter to confirm with the vaccine manufacturers recommendation. Is that right ??
Part C 41.	Vaccination against WNV with a MAF approved inactivate vaccine	Why MAF approved?

Part E. Appendix 1.5	PEI premises must be within 240Kms of the port of embarkation	With PEI completed in Newmarket, UK this works, however, where PEQ is completed in Kentucky & export is from Chicago this condition cannot be made with the continuance of NZMAF issuing CofEs
Part E. Appendix 1.8	The PEI must be located at least 100 metres from other horses	We note this will be reduced to 35 metres in accordance with the risk analysis completed by NZMAF
Part E. Appendix 1.9	The PEI must be located at least 100 metres from domestic animals, including measures to prevent access to the facility by wild animals	We take this to mean that vermin is controlled & that property is fenced for horses.
Part E. Appendix 1.14 Management 21.	Adequate showering facilities	It is unlikely farm stables will contain a shower and piped hot water. A process of staff showering at home each morning, donning clean laundered clothing and having no contact with horses or horse equipment between showering & reaching the PEI should be adopted.
Part E. Management 22	Vector Protection	We assume this requires spray with a long action residual insecticide prior departure from PEI and is already met by Inspection & Treatment 43 b.
Part E. Management 24	The veterinary clinician employed by the premises must record in a register all visits & activities...	We assume this means all 'his' visits.
Part E. Operation 32	All equipment used for horses in the consignment must be specific to one horse etc	Since there is a policy of all in all is this necessary ??
Part E. Operation 35	Straw & Hay must not be used	Whilst shavings are generally used on occasions we may have a horse allergic to shaving so straw is used. Can straw be included as bedding ?
Part E. Duration 36 b.	VS minimum 30 days PEI protected from insect vectors	We understand this to mean if PEI is occurring in a zone where VS is active, however, not in zones where VS is not active. This needs to be clarified with regard to imports from North America.

Part E. 38.	Vector Protection & vector proof facilities	Clarification is required with regard to NZMAF's requirements for vector proofing when transiting ports like Singapore
Diagnostic tests required 47.		This appears covered in 33 b. and could be said to contradict 33 b. where two tests are required.
General		There seems to be an over reliance on determining the conditions by having to cross reference between the Import Health Standard & Guidance Document. When the conditions are completed it would appear more helpful to IRT if the Health Standard spelt out the extra vaccinations & individual tests required so the data was in one document. This should avoid any confusion that might come about whilst referring to two documents.



Australian Government
Department of Agriculture, Fisheries and Forestry

File: AFFA02/5145

15 June 2011

Ms Marnie Thomas
Senior Adviser Animal Imports Team Standards
Animal Imports and Exports
Ministry of Agriculture and Forestry
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NEW ZEALAND

Dear Ms Thomas

Thank you for the opportunity to comment on the *Draft Import Health Standard for Horses* and the *Draft Guidance Document: Horse Import Health Standard*. We recognise that these are generic documents and that specific certification requirements will be taken into account once these documents are finalised and the *Import Health Standard for Horses from Australia* is prepared. The Department of Agriculture, Fisheries and Forestry provides the following comments on the draft documents.

We refer firstly to the ***Draft Import Health Standard for Horses***:

1. Page 4 (point 8) and page 7 (point 26) **equine herpesvirus 1 (EHV-1)**. We suggest that, in line with the *Draft Guidance Document* (page 10, point 35), the disease is listed with the strains specified i.e. 'Equine herpesvirus 1 (abortigenic and paralytic forms)'.

With reference to the ***Draft Guidance Document***:

2. Page 4 Tick examination requires that the inspection be done '*... under the supervision of the Official Veterinarian ...*'.
In both the *Draft Import Health Standard for Horses* (page 8, point 30) and the current *Import Health Standard for Horses from Australia* (point 7.1) the examination for ticks is conducted by a registered veterinarian. We request that the *Draft Guidance Document* includes an option for tick inspection to be done by a registered veterinarian.
3. Page 5 **Model Veterinary Certificate** requires '*For pregnant mares the name of the sire ...*' to be stated. For clarity we suggest addition of the words '*... to which the mare is pregnant*'.
4. Page 10 For **equine influenza (EI)** (point 31 b) requires that '*... vaccination for EI is not practised in the country of export*'. Vaccination of Australian horses in the general population is not practised. Australia will certify to this, as EI vaccine is only registered for use, if required, for export purposes.

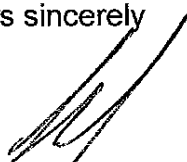
5. Page 10 For **equine piroplasmosis** (point 33) requires that ‘... *the horses were kept for at least the past 30 days in a country that does not import seropositive horses ...*’.

Please note:

- a. Australia does not permanently import horses that test positive for equine piroplasmosis and therefore will certify to this clause.
 - b. Horses that test serologically positive for equine piroplasmosis may be permitted temporary importation to Australia under strict additional quarantine measures. These measures include requirements for the horses to be clearly identified, remain in quarantine and not enter the horse population in Australia, be managed under quarantine surveillance and be exported within ten days of completion of the event for which they were imported. There are also requirements that restrict access to seropositive horses and for approval of quarantine facilities and competition sites.
6. Page 11 For **equine viral arteritis** (point 36,37) it is not clear whether young male horses over 6 months age are to be imported under the conditions for ‘stallions’ or ‘fillies, mares, colts and geldings’. We suggest that the sub-headings reflect OIE terminology (i.e. ‘For uncastrated male horses:’ and ‘For horses other than uncastrated males:’) or that age is specified (e.g. over 6 months).
7. We also note that the *Draft Guidance Document* does not specify conditions for New Zealand horses that visit, for up to 21 days, a third country for competition and then return to New Zealand, i.e. ‘returning horses’. However, we note that the *Draft Risk Management Proposal: Horses* document addresses this issue. We therefore recognise that preparation of the *Import Health Standard for Horses from Australia* will take into account New Zealand horses competing in Australia and then returning to New Zealand.

I trust this information is of use and look forward to ongoing cooperation on this issue between our agencies.

Yours sincerely



ANDREW CUPIT
A/g General Manager
Animal Biosecurity



NEW ZEALAND EQUINE HEALTH ASSOCIATION INC
"Protecting the Health of all New Zealand Horses"

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20 May 2011

Dear Charlotte

Draft Import Health Standard for Horses Submission: New Zealand Equine Health Association

The New Zealand Equine Health Association (NZEHA) welcomes this opportunity to make this submission. Participants in the equine industries in New Zealand (trainers, riders, drivers, stable-hands, farriers, vets, float drivers and so on) have a huge vested interest in biosecurity activities.

The following draft documents have been issued for public consultation and comment:

- Draft Import Health Standard for Horses 
- Draft Risk Management Proposal: Horses  - This provides background information to the development of the IHS
- Draft General Guidance Document: Live Animals 
- Draft Guidance Document: Horse Import Health Standard 

Please find below a submission on behalf of the Committee of the NZEHA on these draft documents.

Part B Approved Countries:

1. The NZEHA notes that MAF 'lists' approved countries. On what basis is a country approved and how does MAF satisfy itself that the country has robust trustworthy/transparent systems?
2. What is the state of play for each of the currently approved countries regarding independent verification as to their compliance with export systems?

3. If further countries are approved, how does MAF do this? Would we receive prior notice?
4. What is the process or who is responsible in MAF to carry out monitoring or surveillance so that in the event there is evidence a country has not complied, we are made aware of it and ensure we respond appropriately to any apparent change in the level of risk? For example, we note that in 2010 Argentina reported that they had a serious outbreak of Equine Viral Arteritis following importation of horses exported from the EU. Was MAF aware of this event and what was our response to this apparent shortfall in the export/ importation system in light of the fact that EU countries are approved to export horses into New Zealand? In other words, what is the system, including criteria, to remove a country from the list of approved countries to import into New Zealand?

Laboratory section:

1. What does approval of an 'approved laboratory' entail?
2. Do we have a list of approved laboratories in each of the approved countries to allow us to cross check that they are the ones being used for the tests required on animals in imported consignments that enter NZ?
3. What audit arrangements do Governments that approve these laboratories complete?
4. How often do we verify them?

Inspection:

Inspections at the port of first arrival should be completed in optimal conditions. Are there standards for these port facilities that enable effective inspection and, if necessary, treatment. If not, the NZEHA submits that these should be appended to these Health Standards. The NZEHA submits these should include such standards, for example, as ensuring provision of inspection level lighting.

Pre export isolation:

What does MAF do to satisfy itself that the MAF standard for these PEI premises is complied with on an ongoing basis?

Part C:

1. Section 31: For endo-parasite control. The NZEHA notes that the OIE does not appear to have recommendations relating to endo-parasite control.
2. In light of developing resistance to anthelmintics worldwide, the NZEHA submits that, to effectively avoid inadvertent introduction of new resistant species, some benefit may be had in a review of this section by an expert parasitologist. It is the NZEHA's interim recommendation the first endo-parasitological treatment on entry into PEI be followed by faecal egg count tests specific for large and small strongyles. The results of these tests should guide the selection of what ever is selected as the most efficacious product used for the second treatment.

Part E Appendix 1:

1. The NZEHA recommends more specificity is required in this standard.

2. Item 5 includes the word 'Stockproof.' What animals are stock? Can dogs, cats and other smaller animals, for example, enter a facility?
3. Item 34 describes states 'temperature elevation.' With regard to temperature elevation, precisely what level of increase should be reported to MAF?
4. Item 45 includes a 'significant' rise in temperature during PAQ. What precisely is a 'significant temperature rise?'
5. The NZEHA submits that specificity might be guided by how many horses with elevated temperatures were reported to MAF in the last year and then comparing this with the total number of imports to NZ last year that had to complete PEI.
6. Item 50. We suggest a rewording to make clear that the cervical and endometrial swabs must be **negative for CEM.**

The NZEHA submits that, although it is important to clearly state in certificates the measures that are required, it is just as important there is an independent means of verifying that the country of export has independent, transparent and accountable systems of oversight for the laboratories, the administration of treatments, and the certifying bodies in the country of export are robust. Without these New Zealand's import health requirements do not manage the real risks of disease entry.

The NZEHA does not support the current documents under consultation, without aligned documentation that describes a system of overview. By themselves, these documents do not adequately manage the risk of importing an exotic equine disease at the time a horse is imported.

Yours sincerely,



Simon Cooper on behalf of the NZEHA

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May 31, 2011

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**SUBJECT: CANADA'S COMMENTS ON WTO NOTIFICATIONS
G/SPS/N/NZL/451**

Canada welcomes the opportunity to provide comments on the above notification dated April 14, 2011 concerning New Zealand's "Draft Import Health Standards for horses". Canada has reviewed the proposed document and would like to provide you with the following points for your consideration.

Specific Comments - Import Health Standards for horses

Part B. GENERAL REQUIREMENTS

Article 11: The proposed New Zealand import requirements indicate that laboratory reports (or copies thereof) must accompany the horses. In Canada, the laboratory results are the property of the exporter and therefore Canada does not provide them to the importing country. Instead, the results of these tests are inserted into a chart in the body of the health certificate which is endorsed by the official veterinarian in charge of the export shipment. Canada would ask that New Zealand allow this method of laboratory result endorsement by Canada.

Part E. APPENDICES

Appendix 1: The proposed New Zealand requirement that necessitates the pre-export isolation (PEI) to be within 240 km of the port of embarkation will be difficult in some situations for the export of Canadian horses. Due to the geographic size of Canada and the limited number of airports that can accommodate the export of live animals, the distance could be greater than 240 km from the PEI. Considering that the health status of horses across Canada is uniform, there is no additional benefit to limiting the distance between the PEI and the airport to 240 km. In addition, the vehicle of transport will be sealed prior to leaving the PEI. The transport of animals in Canada is regulated through the Canadian Health of Animals Regulations. The section titled Transportation of

.../2

Animals regulates the transportation of animals as follows: Section 148 (1) states: subject to subsection (2), (3), and (7), no person shall confine in a railway car, motor vehicle, aircraft or vessel (a) equines, swine or other monogastric animals for longer than 36 hours; subsection (7) states that subsection (1) does not apply to animals if (a) the railway car, motor vehicle, aircraft or vessel is suitably equipped to feed, water and rest the animals; and (b) the animals are fed, watered and rested at intervals of not more than 48 hours in the case of ruminants and not more than 36 hours in the case of monogastric animals. Therefore, Canada would ask that the limitation of 240 km between PEI and the airport be removed for countries that have an equivalent health status throughout their country and have transport regulations to ensure the humane transport of these animals.

Canada appreciates the opportunity to provide these comments, and requests that New Zealand advise as to how these comments will be taken into consideration in the final version of the Regulations.

Canada looks forward to receiving a written response to the comments posed, and is available for any further discussions on the Regulations.

Sincerely,



Daniel Burgoyne

A/Director,
Bilateral Relations and Market Access
Canadian Food Inspection Agency

1. then it is in the form of a declaration that comes from the airline company which is separate to AFCD certification.
2. Point 21 (i), as mentioned previously this occurs after the veterinary certificate has been signed. AFCD requests that a declaration is obtained by the airline to state that this measure has been implemented.
3. Point 23, as mentioned in our point 3 above.
4. Point 24, the horses exported from Hong Kong are exported with Timothy hay which does contain seeds (see attached photo with seed circled). This hay has not been fumigated or irradiated so AFCD believes it may be viable seed. AFCD suggests that the feed is disposed of in New Zealand. AFCD does not suggest that the feed is changed as this increases the risk of colic.
5. Point 26, if testing is still required AFCD would kindly request that the sampling for EIA, equine piroplasmiasis and EVA can be done within 21 days rather than within PEQ. As Hong Kong is free from EIA, equine piroplasmiasis and EVA the risks posed within or prior to entry into PEQ are negligible.
6. Point 28 (c), AFCD would kindly request that the previous recognition that no breeding occurs in Hong Kong and allowance be given that if a horse originates from New Zealand or Australia, and has only been in Hong Kong since importation from these countries, then testing is not required for CEM.
7. Point 30 (a), as mentioned in our point 3 above.
8. Point 31, AFCD recommends that deworming be done within 7 days due to the possible risk of horses having colic in flight. This is not a problem for AFCD as the HK horses are extremely well managed and endoparasite burdens are extremely low.
9. Point 33 (a), the OIE Code does not state that the country cannot vaccinate. AFCD would again recommend that MAF adopt the recommendations of the OIE and no restriction is put in place for vaccination against EI. If measures are put in place then a risk assessment detailing the justification should be done as per the OIE recommendations for measures that are higher than that of the OIE Code.

Point 33(b), In the last sentence "not more than 5 days later" should be "not more than 5 days later". AFCD would suggest that the PEI is 14 days as adopted by Australia and detailed in their Import Risk Analysis Report for Horses from Approved Countries rather than the recommendations of the OIE Code as the assessment conducted by Australia addresses the EI issue is far more detailed and current than the general OIE recommendations. This would also mean some consistency for export

1. to EI free countries (NZ and Australia) that essentially allow unrestricted moved between one another.

AFCD would also kindly request consideration be given to the “pen-side” tests for EI such as the Directigen and Espline test kits. Further information on the sensitivity and specificity for these tests can be provided.

2. Appendixes point 8. Hong Kong cannot comply with 100m separation due to limited space available. The location of the quarantine stables is immediately adjacent to the 1000m track. This track is used during race meetings (once a week for a period of approximately 15 minutes) and barrier trials (once a fortnight from 7am to 8:30am). There is infrequent movement of horses (within enclosed vehicles only) along the road immediately adjacent to the quarantine stables. In addition to this New Zealand PEI has normally been in stables 20m from the adjacent stables (stable door to stable door) with horses moving to exercise areas during which they are 4.5m from the entrance to another stable. These stable doors are normally kept closed but the ventilation intake from one stable is 7m from the exhaust from the adjacent stable. The distance a particle would have to travel from one horse in a stable to another in an adjacent stable is about 15m via the ventilation system.

AFCD would like to explain HK’s status regarding EI. All imported horses are tested for EI using the Espline/Directigen/PCR test prior to departure. All horses are then tested after arrival in HK with the Espline test. All horses in HK are temperature checked twice a day. Any horses in HK with signs or pyrexia or respiratory disease are tested with the Espline test. Permanently imported horses must have 21 days pre-export quarantine (PEQ) prior to import. PEQ can only occur at AFCD/HKJC approved facilities. All permanently imported horses are tested after arrival in HK and spend 14 days in post arrival quarantine. All temporary horses are tested within 48 hours of export and upon importation; they are kept separate from the rest of the Hong Kong local horse population. Hong Kong has not had a case of EI since the outbreak in 1992. All horses must be fully vaccinated prior to import (excluding NZ and Australian imports but this may change) and are vaccinated in HK every 6 months. HK is free of EI on the basis of strict import requirements, pre-import testing, ensuring all imports are adequately vaccinated, strict post-arrival quarantine, post-arrival testing, regular vaccination of the local population, and intensive active and passive surveillance of the local population. Below is the testing for the past 3 years.

	<u>2010</u>	<u>2009</u>	<u>2008</u>
PCR Flu A (by AFCD)	232	292	271
Espline (by HKJC)	1681	1758	1648

AFCD would kindly request the following

- that allowance be given for the use of the 1000m track as it is only for very short periods of time and HKJC will ensure that NZ PEI horses are kept indoors for this period of time and that the stable doors are shut during this time and for 1 hour after the horses have used the 1000m track
 - that allowance is given for use of the road besides the PEI to transport horses as these horses will be in enclosed vehicles
 - that the distance between other horses be reduced to 30m in order to allow other surrounding stables to be used due to severe shortage of space available in HK
 - that horses be allowed to be temporarily moved within 4.5m of the entrance to a stable with other horses so that the NZ PEI horses can have access to a trotting ring, horse walker and the track. HKJC will ensure that the stable doors to these neighbouring stables are kept shut during the movement of the NZ PEI horses.
1. Appendixes point 9. Please see our point 11. AFCD is not aware of any disease that transmitted to horses by aerosol from other species. At HKJC there is a local population of managed feral cats that will be within 100m and many people walk their dogs on the road on the far end of the 1000m track so these animals can come within the 100m. AFCD kindly requests that this requirement is removed.
 2. Appendixes point 16. HKJC do have a financial interest in the horses undergoing isolation but AFCD has the upmost of confidence in the management of the PEQ by HKJC and all the staff employed by HKJC. There are no other facilities available in HK and the operator cannot change. AFCD requests that this requirement is removed.
 3. Appendixes point 20. AFCD kindly request that allowance be given to staff and other visitors to the PEI if it is their first visit of the day and if they have not been in contact with horses since last showering. This has been agreed between HK and AQIS and we would like to harmonise the requirements for easy of staff understanding and implementation.
 4. Appendixes point 27. Please see our point 3 and point 14.
 5. Appendixes point 36(a). Please see our point 20. AFCD would kindly request that PEI is reduced to 14 days.
 6. Appendixes point 37. As mentioned previously AFCD have very limited veterinary resources so AFCD will delegate this function to the HKJC veterinarian to carry out.

Guidance document Horse Import Health Standard

7. Model Veterinary Certificate, first point. AFCD would like to clarify that if a horse is microchipped or has a unique brand (as for all HK resident horses) then the certification will only need to include these unique identifiers and no silhouette is required.

1. Model Veterinary Certificate, fifth point. AFCD would like to continue with the current practice of having multiple horses per certificate as this creates less opportunity for error by AFCD, is less pieces of paper work so the potential for loss of documentation is minimised, is more environmentally friendly and is easier to check by the port veterinarian in New Zealand. Please can you confirm if we can continue with this previous practice?
 2. Model Veterinary Certificate, sixth point. The vaccination certificates for many horses is part of the passport and normally AFCD does not endorse this, will AFCD be required to endorse the passport or can a separate annex be attached to the veterinary certificate listing the most recent vaccinations which will be signed, dated and stamped by the official veterinarian?
 3. Model Veterinary Certificate, eighth to twelfth point. The Model Veterinary Certificate does not contain any parts for completion of these specific details, please can they be included. For the eleventh and twelfth points (if applicable to the aircraft) please refer to our points 10 and 12.
 4. Model Veterinary Certificate, fourteenth point. AFCD does not normally apply a seal to containers as there is no risk for substitution of these animals in Hong Kong or en route as they have been uniquely identified. Furthermore, the possibility of these consignments being released in a third country en route to New Zealand is highly unlikely as these consignments are extremely difficult to offload and then put into a stable and then reload, and this will appear on the flight details, and this will have to be sanctioned by the third country which is highly unlikely to occur. AFCD questions the rationale of this requirement and would like justification if it is required.
 5. Part I: Details of the dispatched consignment, AFCD suggests that irrelevant parts of the document are omitted (i.e. "Game Restocking", "Re-entry", "Temporary Admission", "Category"). Many authorities are unaware of the correct HS Code so it recommended that this is already prefilled. HS codes are a customs issue so it is questionable why this is need on a sanitary certificate.
 6. II.3, as mentioned in our point 3.
 7. II.8, as mentioned in our point 27 and this will also occur after the certificate has been signed so AFCD kindly requests that this is a separate certificate issued by HKJC.
 8. II.11, as mentioned in our point 14.
 9. II.12-14, as mentioned in our points 10-12.
 10. II.16-17, as mentioned in our point 2.
- II.16(b) and other points, the certificate requires AFCD to certify "on the day of export" this is different to 24 hours prior to shipment as it may be the day prior to export and in many cases flights

1. leave in the early hours of the morning so this is not possible. AFCD recommends that it is changed to “at the time of inspection” to accurately reflect what the certifying veterinarian has carrying out.
2. II.21 (b), HK does not have an official programme for CEM so cannot meet the requirements for II.20 nor II.21, AFCD would suggest that point 21(d) “if a horses does not meet requirement c. and d.” is extended to include requirement b. AFCD would also kindly request the CEM testing is exempt for horses that are NZ/Australia origin and have only been resident in Hong Kong as detailed in our point 16.
3. II.24, as mentioned in our point 3 and 18.
4. II.31, as mentioned in our point 19 and point 20.
5. II.32 (c), please clarify what test is required as the OIE Manual only recommends the HI test. Will PCR and ‘pen-side’ rapid tests such as the Directigen and Espline be acceptable?
6. II.36-38. In HK no EVA vaccination and breeding occurs. All imported horses must be sero-negative. AFCD would kindly request that the previous measures of only testing stallions remains.
7. As the risk is negligible of AFCD exporting infected animals this would not increase the risk for NZ imports. If testing of mares and geldings is still required AFCD would kindly request that only one test is required and in the unlikely event that the horse is seropositive (probably due to laboratory error) then a further test is required to demonstrate the horse has a stable or decreasing titre. As mares and geldings are only acutely infected and then clear infection, one test to determine the serological status will be sufficient, or if the animal is positive a further test to show that it is a decreasing or stable titre will show that it is not an acute infection for serologically positive animals. AFCD understands that vaccination mainly occurs in stallions and not in mares/geldings.

The table below reflects the number of animals that have been tested for EVA in Hong Kong over the past 4 years. This testing includes all post-import, pre-export and testing to rule out suspicion of disease. All the testing has not shown disease as reported to the OIE.

Equine viral arteritis (EVA) is not a notifiable disease at this stage in HK.

	<u>2010</u>	<u>2009</u>	<u>2008</u>	<u>2007</u>
EVA (SNT)	38	116	133	52

8. II.41 and 46, AFCD would kindly request confirmation that MAF regards HK as being Hendra and Nipah free, which is in line to our reporting to OIE.

1. II.49, there is no requirement in HK for notification for human infections of screwworm and medical reasons for sick leave is confidential so AFCD have no means to certify the human component to this requirement. Please can this part be amended?
2. II.61, as mentioned in our point 8.