

REVIEW OF SUBMISSIONS ON:

DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION INTO NEW ZEALAND OF CATS
AND DOGS FROM APPROVED COUNTRIES

Ministry of Agriculture and Forestry
Wellington
New Zealand

31 March 2011

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MAF

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31 March 2011

Approved for general release

Mathew Stone
Animal Export/ Import Group Manager
MAF

INTRODUCTION

The draft import health standard for the importation into New Zealand cats and dogs from was notified for consultation on 18 January 2011.

MAF received submissions from the following:

1. Catherine Allaway PetAir UK Ltd.
2. Marcel Brozius ACE Pet Moving GmbH, Switzerland
3. Paul Jeffery Transfur Animals, UK
4. Helmut Animals First Bogner OG, Austria
5. Karen Shiel Boomerang Pet Carrier, Canada
6. Danuta Havemann Keringa-Petwings, South Africa
7. Thelma Morell Farfalla Papillons & Phalenes, NZ
8. CW Sorenson Golden Arrow Shippers, UK
9. Alexis Mitchell Private importer, NZ
10. Linda Broekhof Live Animal Logistics, The Netherlands
11. Lee Guertler, MD Private Importer, NZ
12. Lisa Kam and John Veterinarian, Hawaii
13. William Hansen Shipping agent, NZ
14. Mat Walker Donquest Kennels, New Zealand
15. Norma Dennis Pet Exporter, Bahrain
16. Della Lin Private Importer, Hawaii
17. Adrian Moody Private Importer, NZ
18. Louise Moody Private Importer, NZ
19. Brent Moody Private Importer, NZ
20. Wendy Moody Private Importer, NZ
21. Dr. Grant William Clarke Agriculture, Fisheries and Conservation Dept., Hong Kong
22. Charles J. Pettis Private Importer, Cook Islands
23. Denise Clark Shado-Lans Quarantine Facility, NZ
24. Keiko Fujibayashi New Zealand Embassy, Japan
25. Marion Wilson Veterinarian, New Zealand
26. Julie Clayton-West Private Importer, NZ
27. John Beckett Board of Airline Representatives (BARNZ)
28. Laetitia Roalofse Private Importer, South Africa
29. Mike Mune Dandy Dogs, NZ
30. Domonique Roelofse Private Importer, South Africa
31. Jaime Berry Jetpets Animal Transport, Australia
32. Alan GH Emerson JP, NZ
33. Keith Coppins Greyhound Racing New Zealand
34. Robyn van den Brink Pethaven Quarantine Services, NZ
35. Brian Falkingham Mermalade Briards, NZ
36. Robyn Martin Biosecurity Australia

SUMMARY

This document summarises the issues raised in the submissions, and presents the MAF response to each issue raised. Complete submissions from external stakeholders are included at the end of this document.

MAF wishes to express sincere thanks to all who contributed to the Review of Submissions. The thoughtful and constructive suggestions are appreciated. Although not all suggestions could be incorporated into the final Import Health Standard for Cats and Dogs, they will be taken into consideration as the new requirements and operational issues are reviewed over time.

Any changes resulting from the review as well as internal suggestions or corrections from MAF staff have been incorporated into the provisional Import Health Standard for Cats and Dogs and the revised Guidance Document to the Import Health Standard for Cats and Dogs and Risk Management Proposal: Cats and Dogs.

The review of submissions resulted in the following changes to the draft Import Health Standard for Cats and Dogs:

- Final inspection time was changed from within 24 hours of shipment to within 48 hours of shipment, in response to several submissions that identified practical problems with the initial proposal.
- The timing requirement for *Babesia gibsoni* testing was changed to within 16 days of shipment, again in response to practical problems with getting test results in time for export.
- Some minor certification and editing changes were made.

Several submissions addressed the revised biosecurity clearance requirements, including quarantine requirements and the specified hours for biosecurity clearance at the border for animals arriving from Australia. These requirements have not been changed. However, it is emphasised throughout this document that the measures in place will be formally reviewed in two years, and specified hours for clearance of Australian animals at the border may be adjusted sooner if indicated. We look forward to feedback and constructive suggestions from all stakeholders involved in importing cats and dogs.

SUBMISSIONS

1. CATHERINE ALLAWAY VN SENIOR PET TRAVEL CONSULTANT, PETAIR UK LTD.

1.1 **Would it be possible to understand the reasoning behind the potential new requirement for 10 days quarantine for dogs & cats coming directly from the UK? As New Zealand has not had a quarantine period before for pets from the UK, we will need to be able to give some reasons for the change to our clients who will, understandably, be quite opposed to the idea. In fact, I'm sure that many UK clients would far rather Rabies vaccinate their pets and Rabies blood test them before export to NZ, if this was a way to remove the need for quarantine. Although only 10 days is proposed, clients are incredibly "anti" quarantine and will conform to any additional requirements in order to try & remove the need to have their pets away from them for any length of time.**

Is there any kind of compromise or alternative to quarantine that can be suggested? Further blood testing is always possible before departure for any conditions that Biosecurity have issue with.

MAF comment: The biosecurity clearance scenarios considered ranged from clearance of all compliant cats and dogs at the border to post-arrival quarantine for all imported cats and dogs. It was agreed that it is a high priority to have official veterinarians undertake all physical inspections. This is a significant shift from current practice, where cats and dogs that do not require post-arrival quarantine are cleared at the border by inspectors, and animals in quarantine are cleared by official veterinarians.

Post-arrival quarantine requirements were previously based on rabies risk mitigation, although they also provided a "safety net" for other risks. The risk mitigation measures for rabies no longer include quarantine. However, the value of post-arrival quarantine was considered to allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health.

The final recommendation that cats and dogs arriving from all countries except Australia be sent to post-arrival quarantine for a minimum of 10 days was made after extensive review of the risk management options, veterinary resourcing, statistics of animal arrivals, and current government-to-government agreements.

Cats and dogs from Australia have fewer risk mitigation measures and therefore fewer documentation requirements due to Australia's health status. The documentation check and physical inspection for cats and dogs from Australia will be conducted at the border. Any animal that is not compliant with the requirements, or is found to have fleas or ticks; will be sent to post-arrival quarantine. Fractious cats or dogs, and those arriving outside of the scheduled time for veterinary inspections, will be sent to post-arrival quarantine until all measures have been met.

Measures will be reviewed in two years, and updated if indicated based on compliance. All non-compliances are recorded and reviewed, and measures can be updated sooner if necessary.

Unfortunately there are not additional blood testing measures that can be applied instead.

- 1.2 The need for an import permit is completely understandable to track incoming pets. In fact when this requirement was dropped several years ago, we thought it would be brought back in far sooner**

MAF comment: Noted.

- 1.3 If the changes are adopted, will there be a period where old & new systems are still acceptable, or will there be a date set well in advance where the change will happen? Any advice you may have on possible dates of change would be very much appreciated**

MAF comment: This review of submissions and the final draft of the import health standard will be sent to all stakeholders along with the anticipated date that the new standard will be legally issued. Once the new import health standard has been issued, the new requirements will apply.

2 MARCEL BROZIUS, ACE PET MOVING GMBH, SWITZERLAND

- 2.1 We would like to include our comments and concerns for the changes as below. At first we would like to repeat the main changes that concern dogs & cats from countries where rabies is absent or well controlled (in our case: Switzerland) to assure we understand it correctly. Please correct us if we understood something wrong:**

| REQUIREMENT | NEW | OLD |
|-------------------------------|---|--|
| Quarantine | 10 days upon arrival | 30 days upon arrival |
| Titre test | Between 3 – 24 months prior to exportation | Between 5 – 12 months prior to exportation* |
| Faecal collection | NOT required | Twice within 30 days at least 14 days apart |
| External treatment | Within 30 days at least 14 days apart ** | Within 4 days |
| Brucella canis testing | Within 14*** days | Within 30 days |
| Babesia gibsoni | Within 14*** days | Within 10 days |
| Examination | Within 24 hours **** | Within 4 days |

MAF comment:

*Old rabies requirement for titre tests were within 6-12 months of export and within 30 days of export.

**Note that inspection is required as well as treatment, and 2nd treatment must be given within 2 days of shipment.

***Test timing requirements changed to within 16 days of shipment following review of submissions.

****Final examination requirement has been changed to within 2 days of shipment following review of submissions.

- 2.2 The main concern we have with the above changes is that the examination now needs to be within 24 hours prior to departure. ...With the new restriction of this being within 24 hours makes this procedure difficult and will delay many shipments due to the short time frame – and therefore some of the test dates and treatments may also fall out of the time frame.**

MAF comment: Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

Documentation accompanying the cat or dog must include the original, certified Veterinary Certificate B. A copy of Veterinary Certificate A and laboratory results that are certified (all pages stamped and signed) by an official government veterinarian is acceptable.

3 PAUL JEFFERY, TRANSFUR PETS, UK

3.1 I have read through all of the documents, and notice that a significant change arriving from the UK would be 'Post Arrival Quarantine for a minimum of 10 days for cats and dogs'.

Are these facilities to be built or is it envisaged that cats and dogs would have this at Auckland, before onward travel to say Dunedin or Nelson? Also, could you possibly let me have an idea of quarantine costs, as many of our customers are starting to plan their exports throughout 2011 into 2012 and beyond?

MAF comment: There are currently five approved transitional facilities in New Zealand. These are privately operated businesses run by MAF-approved operators and are supervised and audited by MAF Verification Agency veterinarians. There are three facilities in Auckland, one in Levin (Wellington area), and one in Christchurch. Costs are determined by the facility operators. Contact details can be found in the Guidance Document to the Import Health Standard for Cats and Dogs.

4. HELMUT, ANIMALS FIRST BOGNER OG, AUSTRIA

4.1 One question - are similar rules also in discussion for import to OZ? As far as I know there is free movement in between NZ and OZ so if OZ doesn't change there will some clients maybe use NZ with the new rules and than re-export to OZ??

MAF comment: We are aware that dog and cat imports are under review in Australia, but we don't know their timetable for changes, if any. Biosecurity Australia and MAF keep each other updated on dogs and cats imports as there is a significant volume of trade between the two countries. Biosecurity Australia may review their import requirements for cats and dogs from New Zealand to Australia as a result of MAF changes in imports from third countries.

There is not free movement of animals between Australia and New Zealand. Cats and dogs travelling between Australia and New Zealand must meet the specific certification and testing/treatment requirements. If a dog or cat is imported to New Zealand, and then exported from New Zealand to Australia, it must meet the Australian eligibility, health and certification requirements before it can be imported to Australia. Contact the Australian Quarantine and

Inspection Service (AQIS) or see the following link for further information on importing animals to Australia:

<http://www.daff.gov.au/aqis/cat-dogs/countries/cat1?name=New%20Zealand>

We recommend that you contact Biosecurity Australia or AQIS with questions regarding any changes planned in their requirements.

5. KAREN SHIEL, BOOMERANG PET CARRIER, CANADA

5.1 All of the changes would be welcome, except for the final inspection within 24 hours of departure. As Calgary is located 1.5 hours by plane to our gateway in Vancouver, there is not enough time in one day for the pet's attending veterinarian to do the final clinical exam, get the completed documentation to the Calgary CFIA animal health office for endorsement, get the pet checked in for a flight to Vancouver, get the seal for the travel kennel from the Vancouver CFIA animal health office and give the pet a comfort stop before the long haul journey. We must have our local CFIA animal health office sign off on the Zoosanitary Certificate and then the Vancouver CFIA animal health office assigns the seal. We also export pets from cities even further inland in Saskatchewan and there are just not enough hours in one day to meet all of the requirements. Add to that, that sometimes the only available direct flight from Vancouver to Auckland departs on a Sunday. That would make it impossible for the CFIA animal health offices to sign off on the Zoosanitary Certificate in Calgary, and assign the seal in Vancouver. Absolutely impossible.

MAF comment: Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

Documentation accompanying the cat or dog must include the original, certified Veterinary Certificate B. A copy of Veterinary Certificate A and laboratory results that are certified (all pages stamped and signed) by an official government veterinarian is acceptable.

5.2 As the protocol stands now, it is very difficult to coordinate all of timing for the blood tests which must be conducted in the States as Canada does not have any approved labs. As I'm sure you are aware, we have had to postpone and rebook pet shipments because we have not been able to get the 30 day rabies titre test and the 10 day Babesia tests back in time.

MAF comment: We have attempted to balance practical considerations with the risk management options. The Babesia test timing requirement was extended to “with 16 days of shipment”, and the 30 day rabies titre test is no longer required.

6. DANUTA HAVEMANN, KERINGA-PETWINGS, SOUTH AFRICA

- 6.1 Thank you for the opportunity to have a few things clarified and to comment on the new proposed health standard. We are ecstatic that South Africa's status has finally changed. This will also allow clients to go to Australia via New Zealand unless AQIS changes there current health standard.

Please clarify why the cat or dog has to be nine months of age or older at date of shipment. I know this corresponds with the primary rabies vaccine not being less than 6 months prior to shipment. As most cats and dogs have their first Rabies vaccine at 3 months of age, waiting an additional 1 month for the anti-bodies then doing the Rabies Titre Test, this is then 4 months of age then the 3 months min. period waiting before departure takes one to 7 months of age and not 9 months. Please advise why it was decided on this time frame.

MAF comment: The OIE (World Organisation for Animal Health) requirements for rabies specify that the rabies vaccination must be given at least six months before import. This is based on the time it may take before an animal shows symptoms of rabies. In other words, if an animal is infected with rabies before it is vaccinated, and is then required to wait six months before it is eligible for import, it should show signs of infection before being imported. This is necessary as there is not a reliable test for rabies infection in live animals.

- 6.2 The examination within 24 hours prior to departure is going to put an immense strain on not only pet shipping companies but on a private individual. This means the day before the flight the examination will have to take place very early. Then the paperwork will have to go through to state vet for certification and in South Africa most stat vets don't certify after 12:00. This leaves no room to correct any problems that may arise. Would it be possible if it could not be looked into if we could revert back to the 4 days prior to departure examination?

MAF comment: Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

Documentation accompanying the cat or dog must include the original, certified Veterinary Certificate B. A copy of Veterinary Certificate A and laboratory results that are certified (all pages stamped and signed) by an official government veterinarian is acceptable.

- 6.3 If a pet has had a Rabies vaccine on 13 December 2010 and there are no other Rabies vaccines prior to this one then this pet can only leave SA for NZ 6 months from this vaccine.

MAF comment: Yes, that is correct.

- 6.4 This pet had a Rabies test done on the 03/01/2011. Is there a waiting period from the Rabies Vaccine until the test is done? In this case 3 weeks is this ok for the new import conditions?

MAF comment: There is not a mandatory waiting period, but it is recommended to wait at least 3 weeks after vaccination to allow time for the animal's immune system to make antibodies in response to the vaccination, which is what the titre test measures.

6.5 Another thing I am unclear on is if a pet has been regularly vaccinated over the years but then only gets a microchip before the last set of vaccines is this current vaccine then considered as the primary and the others ignored or does the entire vaccination history get taken into account. E.G. Rabies vaccine every January from 2005, but the chip was only inserted with the January 2011 vaccine would the January 2011 vaccine be the primary and the pet has to wait 6 months before leaving?

MAF comment: The pet would have to wait six months after the vaccination given following the microchip insertion. The microchip identification must be scanned and verified each time a test, treatment, or inspection is done. The number must be recorded on all laboratory tests and vaccination records.

7. THELMA MORRELL, FARFALLA PAPILLONS & PHALENES, NEW ZEALAND

7.1 Apparently in August 2010 the original idea was to do away with quarantine stay altogether but the Clarks are claiming credit for wanting some retention, the rationale by them and MAFBNZ seems to be based mainly on Ticks. Yet you expressly exclude Australia from any Quarantine or Import Permit. This is the very country most likely to be an entry source and has one of the most toxic ticks in the world, with the ability to hospitalize and even kill humans!!! Coming from Queensland/Far Northern NSW we know from experiences of both personal friends and local newspaper reports, as well as with dogs, in spite of all precautions. Our vet used to say that three way treatment was needed, topical (once a month), oral (alternate days) and daily searching. East coast Australian veterinary hospitals/clinics as well as the research of the University of Queensland also recommends this.

I would therefore like to make the following suggestions -

1) that the August idea of doing away with quarantine stays be reinstated for least risk countries, with the use of Frontline Plus (topical) and Proban tablets (oral) WITHIN 2 DAYS OF DEPARTURE, plus the other tests currently used for different things..

4 days is too long a time not to pick up a tick. Proban is an oral medication for control of ticks, fleas and demodectic mange in dogs and for control of (officially) fleas in cats...It is frequently used in combination with Frontline for additional tick prevention in high risk areas.

MAF comment: Thank you for your suggestions. Regarding external parasite control, MAF relies on veterinary recommendations for tick and flea control, as product registration and availability varies between countries. Frontline has been the specified treatment for external parasites in some of the cat and dog import standards, but it has been recommended by parasitologists and veterinarians that treatment should not be limited to one product due to potential loss of efficacy over time. Unfortunately many sources state that Proban should not be used on greyhounds due to potential toxicity. As a large percentage of dogs imported from Australia are racing greyhounds, MAF cannot require use of this product.

7.2 **2) That the rabies-free countries currently needing no Import Permit retain this status.**

To give Australia special privileges because of Trade Relations (ha!) is totally hypocritical. Either include them or give the previously exempt countries their status back.

MAF comment: The biosecurity clearance scenarios considered ranged from clearance of all compliant cats and dogs at the border to post-arrival quarantine for all imported cats and dogs. It was agreed that it is a high priority to have official veterinarians undertake all physical inspections. This is a significant shift from current practice, where cats and dogs that do not require post-arrival quarantine are cleared at the border by inspectors, and animals in quarantine are cleared by official veterinarians.

Post-arrival quarantine requirements were previously based on rabies risk mitigation, although they also provided a “safety net” for other risks. The risk mitigation measures for rabies no longer include quarantine. However, the value of post-arrival quarantine was considered to allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health.

The final recommendation that cats and dogs arriving from all countries except Australia be sent to post-arrival quarantine for a minimum of 10 days was made after extensive review of the risk management options, veterinary resourcing, statistics of animal arrivals, and current government-to-government agreements.

Cats and dogs from Australia have fewer risk mitigation measures and therefore fewer documentation requirements due to Australia’s health status. The documentation check and physical inspection for cats and dogs from Australia will be conducted at the border. Any animal that is not compliant with the requirements, or is found to have fleas or ticks; will be sent to post-arrival quarantine. Fractious cats or dogs, and those arriving outside of the scheduled time for veterinary inspections, will be sent to post-arrival quarantine until all measures have been met.

Measures will be reviewed in two years, and updated if indicated based on compliance. All non-compliances are recorded and reviewed, and measures can be updated sooner if necessary.

7.3 I think some European countries might have more of a tick population than others - I have never experienced a tick in all my stays in Sweden or Norway, forests or grass; I have however had one in a German wood and know of two other instances of German ticks..

MAF comment: The risk varies from country to country, and individual country risk assessments are not feasible in most cases. Surveillance for ticks and fleas is not often available, nor is information on the prevalence of diseases transmitted by ticks unless they are reportable diseases in the country of export. Any tick or flea incursions and all other non-compliances with the requirements are documented, and will be taken into consideration when the requirements are reassessed in two years time.

7.4 3) Proposed MAF Inspection times Wellington 1330 to 1630 hours (weekdays only) my most recent import from Sweden gave me horrendous problems from beginning November 2009 to 1st April 2010 - the only thing that did not seem to impact was the Icelandic volcano chaos! There were a number of factors involved; including the non-transfer from a BA flight to Qantas in

Singapore, so that when she arrived in Sydney one airline did not know what to do with the unexpected arrival (quarantine) and the other was running around trying to find out where the dog was! This involved Sydney, Singapore, Heathrow, Wellington and Auckland. The result was the first flight she could be put on was scheduled to arrive in WLG at midnight, but was late. We got home to Levin at 3.30am. My point is that unexpected things can and do happen and the loss of the midnight flight option (which most of my dogs seem to have come in on) seems unfair to people in the lower North Island.

MAF comment: Animals going into post-arrival quarantine can arrive at any time and be directed to the quarantine facility specified on the import permit. Cats and dogs imported from Australia may also arrive at any time, but to be given biosecurity clearance at the border they need to arrive during the specified hours. These hours were determined after consideration of flight schedules from the major ports in Australia to the major ports in New Zealand, Verification Agency veterinary resources, historical data on the number, port, and time of arrival of cats and dogs, and consultation with MAF Quarantine Inspectors in Auckland, Christchurch, and Wellington.

We acknowledge that flights may be delayed and flight schedules may change, and therefore hours may need to be adjusted in the future. However, these hours should accommodate pet shipment from Australia and allow for efficient and thorough clearance at the border. All constructive feedback will be appreciated and adjustments made if indicated.

8. C W SORENSON, GOLDEN ARROW SHIPPERS, UK

8.1 Will the import permit list the import health standard and date?

MAF comment: Yes, the import permit will include the relevant Import Health Standard and date of that standard. Current import health standards are also accessible on the MAFBNZ website: <http://www.biosecurity.govt.nz/ihs/search>

8.2 Golden Arrow Shippers request that dihydrostreptomycin be added back into the import health standard treatment as a treatment option for Leptospirosis.

MAF comment: This option was removed because we received feedback that this drug was no longer available in many countries. However, as it is still available for use in your country, this option has been added back into the Import Health Standard.

8.3 Query re “date of shipment” definition and requirement for final inspection and certification within 24 hours of shipment.

MAF comment: The date of shipment refers to the date the animal is shipped from the country of export.

Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

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9. ALEXIS MITCHELL, PRIVATE IMPORTER, NEW ZEALAND

9.1 Thank you for your email with the enclosed 'import health standard' attachment. I submit that the change in quarantine time from 30 days to 10 days is sensible and preferable. Ten days is a reasonable amount of time for animals to be observed for any external parasites and symptoms of infectious disease to show up.

MAF comment: Noted.

10. LINDA BROEKHOF, LIVE ANIMAL LOGISTICS, THE NETHERLANDS

10.1 "24 hours shouldn't be a big problem as most vets want to help their clients with changing the time of examination a bit but 2 days would be better as the Gov vet is not that tolerant here in Holland, Amsterdam. We would really like it if it can stay by 4 days, but if you need to change it, 3 or 2 days in advance is better, not 24 hours. I think we all, always arrange the crate seal and cert B within 24hours as we do that half an hour before we deliver the pets to the airline.

MAF comment: Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

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10.2 I totally agree...that the other changes are great, especially the shorter quarantine period.

MAF comment: Noted.

11. LEE GUERTLER, MD, PRIVATE IMPORTER, HAWAII

11.1 I am the owner of 5 Jack Russell terriers that have short white hair and are experienced travellers as I bring them to NZ from Hawaii on holiday 3-4 times yearly. We own a several thousand acre property near Masterton and the dogs have been travelling without incident for over 7 years. They are used to being handled and examined by MAF staff on arrival in Auckland and I use the services of Qualified Pet Service to assist in their transition and paperwork.

I have reviewed the proposed changes to the animal import requirements from Hawaii in light of the issues related to preventing and detecting ectoparasites and would like to submit the following modification specifically as it relates to dogs which have been treated twice with a designated topical agent to kill fleas and ticks and then examined by a Hawaii Vet and certified flea/tick free.

Proposal

1. The cat or dog was treated by a veterinarian TWICE with a topical product registered for the control of ticks and fleas at the manufacturer's recommended dose and certified as free from external parasites at each treatment. The first treatment was given within 30 days of shipment and at least 2 weeks before the second treatment, and the second treatment was given within 4 days of shipment;

AND

2. The cat or dog was inspected and certified as free of external parasites within 24 hours prior to shipment;

AND

3. The cat or dog was inspected and found to be free of external parasites post-arrival, prior to receiving biosecurity clearance.

I would hope that after fulfilling all three of these criteria (which my dogs always have done) I would then not have to submit them to further 10 day quarantine in NZ to see if engorged ticks appeared.

As you can see from the frequency of my visits this would be an unreasonable hardship and result in me having to quarantine the dogs 30-40 days each year.

MAF comment: The biosecurity clearance scenarios considered ranged from clearance of all compliant cats and dogs at the border to post-arrival quarantine for all imported cats and dogs. It was agreed that it is a high priority to have official veterinarians undertake all physical inspections. This is a significant shift from current practice, where cats and dogs that do not require post-arrival quarantine are cleared at the border by inspectors, and animals in quarantine are cleared by official veterinarians.

Post-arrival quarantine requirements were previously based on rabies risk mitigation, although they also provided a "safety net" for other risks. The risk mitigation measures for rabies no longer include quarantine. However, the value of post-arrival quarantine was considered to allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health.

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Cats and dogs from Australia have fewer risk mitigation measures and therefore fewer documentation requirements due to Australia's health status. The documentation check and physical inspection for cats and dogs from Australia will be conducted at the border. Any animal that is not compliant with the requirements, or is found to have fleas or ticks; will be sent to post-arrival quarantine. Fractious cats or dogs, and those arriving outside of the scheduled time for veterinary inspections, will be sent to post-arrival quarantine until all measures have been met.

Measures will be reviewed in two years, and updated if indicated based on compliance. All non-compliances are recorded and reviewed, and measures can be updated sooner if necessary.

11.2 We have no exotic ticks in Hawaii I am reliably informed both my vet in Honolulu Dr Lisa Kam who is the past president of the Hawaii Vet Society and the United States Federal vet Dr Falls. The COMMON BROWN DOG TICK is the only tick in the island and can reliably be 100% killed by a double application of topical agents. Furthermore, the strict quarantine Hawaii has in place will help insure the safety of both NZ and Hawaii form exotic pests and diseases.

MAF comment: The brown dog tick (*Rhipicephalus sanguineus*) is not present in New Zealand. Although effective topical agents may kill the majority of targeted parasites, they do not kill 100% in many cases (Import Risk Analysis, page 126 <http://www.biosecurity.govt.nz/files/regs/imports/risk/cats-dogs-canine-semen-ra.pdf>).

11.3 Please consider this a formal request to place dogs from Hawaii in the same NON QUARANTINE category as Australia.

MAF comment: Proposals regarding a country's health status or proposals for equivalent risk management measures must be made on behalf of the government veterinary authority.

Part D of the Import Health Standard does allow for proposals for equivalent measures to be made by the certifying government's veterinary authority, and the details are listed in the Guidance Document, as follows:

Occasionally it may be found that, due to circumstances beyond the control of the importer or exporter, a consignment does not comply with the specific requirements in this import health standard, but may meet the outcomes sought. In such cases, a permit to import application may be made, equivalence granted and a permit to import issued at the discretion of MAF Biosecurity New Zealand. This must be done prior to shipment. The following information must be forwarded by the certifying government's veterinary authority for a request for equivalence to be considered:

- 1) Which clause/s of the import health standard cannot be met and how this has occurred;
- 2) The reason the consignment is considered to be of an "equivalent health" status;
- 3) The reasons why the veterinary authority of the country of origin believes this proposal should be acceptable to the New Zealand Ministry of Agriculture and Forestry and their recommendation for its acceptance.

Requests for equivalence should be sent to animalimports@maf.govt.nz

11.4 I realize that there is concern about more than just external parasites on dogs.

The stringent screening that is required by NZ and which my vet and I have always adhered to would have protect my Jack Russell's from travelling to NZ with any of the following:

Cats and dogs

- a. External parasites
- b. Internal parasites
- c. Rabies

Dogs only

- d. Babesia canis
- e. Babesia gibsoni
- f. Brucella canis
- g. Canine Transmissible Venereal Tumour
- h. Filariosis (Canine Heartworm, Dirofilaria immitis)
- i. Leptospirosis (Leptospira interrogans, serovar canicola)

Please review the content of my request and let me know that you have received it and will place it before whatever decision making body is appropriate so that I may continue to bring my dogs to NZ without the undo hardship of 30-40 days quarantine yearly.

Any comments or additional input you might care to offer us would be most welcome.

MAF comment: MAF recognises and appreciates the vigilant efforts you and the Hawaiian veterinarians have continuously made to comply with New Zealand's biosecurity requirements.

- 11.5 Given the strict guidelines that Hawaii has maintained because of dealing with Guan, Micronesia, and the US mainland as well as the obvious necessity to comply with the paperwork and testing mandated by NZMAF before flying to NZ I feel certain that no pet owners who make it past Hawaii vet screening would be an issue.

Given the problems we in Hawaii have seen from the above mentioned areas it's no wonder MAF wants quarantine. I would agree---- just not for Hawaii and Australia.

MAF comment: Noted.

12. DR LISA KAM, VETERINARIAN, HAWAII & JOHN, QUALIFIED PET SERVICES, NEW ZEALAND

- 12.1 I am writing to support the request that DOGS FROM HAWAII be placed in the same category as Australia and be allowed to travel to New Zealand without an additional 10 day quarantine.

Specifically, the Jack Russell terriers owned by Drs Lee Guertler and Della Lin are experienced travellers and not fractious animals. They have short white hair making external examination a practical and simple procedure, and are used to being examined on entry to New Zealand by MAF staff. They travel to New Zealand with their owners multiple times yearly, remaining for 4-6 weeks each time. All NZ MAF import regulations and animal examinations have been carefully conducted in Hawaii prior to every visit to New Zealand. There have been no incidences of external parasites or problems relating to the dogs with regard to any of the other diseases on the MAF watch list. The proposed

double dose protocol of a topical agent would result in a 100% kill of the common brown dog tick, which is the only tick found in Hawaii.

Placing these dogs in a 10 day quarantine so the proposed mandatory examination by a veterinarian rather than a MAF inspector can be conducted will result in them being quarantined 30-40 days every year and would be an undue hardship. Treating them in the same manner as dogs arriving from Australia would create no biologic risk to NZ-MAF since Hawaii quarantine and the professional standards of Hawaii veterinarians have always been at the highest level.

Therefore, I am formally asking that HAWAII BE PLACED THE SAME "NO ADDITIONAL QUARANTINE" STATUS AS AUSTRALIA.

Modifying the proposal to read:

"Animals arriving from all countries except Australia and Hawaii will be sent to post-arrival quarantine for a minimum of 10 days. This will allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health" would be a reasonable change given the data available and would not significantly impact the proposed process as there are few animals travelling to NZ from Hawaii.

MAF comment: Noted. Please see responses to submission 11.

13. WILLIAM J HANSEN, SHIPPING AGENT, NEW ZEALAND

13.1 I share a significant concern as an international shipping agent and an international dog enthusiast and make my submission accordingly.

I agree that the global biosecurity risks to NZ must be managed BUT according to the real risks and not the perceived risks. Part of this risk management must be based on the completion and ongoing relevant research and analysis to permit sensible valid levels of risk management for the particular risk from that particular country or country.

I do suggest at this time there is insufficient quantifiable and qualitative evidence available to those who may make these decisions to draft up new guidelines. I do not agree that MAF alone are tasked or responsible to the status quo ALONE and without the research information from the international community of which NZ is part. for example requiring quarantine for dogs entering NZ from risky countries - should lie at the borders of those countries - and not ours - we should have no requirement for quarantine for any period what-so-ever only in exceptional circumstances of "lockdown" - and this would only probably be for rabies. Dogs arriving at our borders must not have been sent unless they are cleared by the exporting country. Why have a 2 bite at the cherry?? Does it once do it properly and record and publish and re-assess and modify to increase or lessen the restrictions should the actual level of risk increase. Example two- Why alter UK / Sweden protocols where dogs can be exported into NZ directly from Sweden. Why does NZ have to "treat FOR rabies to these countries?? Some common sense is required- not just more restrictions costs and without any relevance to the actual level of risk?? There has been no rabies reported into NZ UK or Sweden?? IT is overly bureaucratic and lacks the BIG picture.

So a review is well timed and I support this. HOWEVER please establish and prove the reasons why with quantifiable data not a blanket provision- set out what purpose and to achieve what for what risk from what country for those diseases based on the facts...

MAF comment: The import health standard requirements are based on the risks and risk management measures identified in the 2009 *Import Risk Analysis: cats, dogs and canine semen*. <http://www.biosecurity.govt.nz/files/regs/imports/risk/cats-dogs-canine-semen-ra.pdf>

The *Risk Management Proposal: Cats and Dogs* issued with the draft import health standard outlines the risk management options from the import risk analysis and the practical issues taken into consideration in determining the selected risk management option(s) included in the import health standard. There are no rabies requirements for countries recognised as rabies-free, including the UK and Sweden.

13.2 Given pet passports schemes in countries of origin and protocols- please don't add yet another list of risk management to OUR MAF - unless situation demands it.

The revenue - costs and benefits must support "less" rather so than "more" and if user pays remains then as a user we have the right to transparency and further comment.

Dog owners and NZ citizens pay for this demanding requirement - and from much experience it is overly bureaucratic and inefficient and unnecessarily expensive - Utilising professional vets to manage and monitor with modern technology and information and treatments surely should suffice and therefore adopting a less approach to MAF involvement without good reason in many cases is my preferred approach

MAF comment: The revised rabies requirements are similar to those required for the Pet Passport Scheme. However, New Zealand is free of many other diseases and pests not covered by the Pet Passport Scheme, therefore other measures are required. While the New Zealand government does pay for the development of most import health standards, all costs associated with importing an animal are the responsibility of the importer, including clearance and inspection fees.

13.3 Well done to ask us our opinions. I suggest the NZ dog community is invited to comment- NZKC included.

MAF comment: Thanks. Notification of the consultation was sent to the New Zealand Kennel Club and as many stakeholder groups as we could identify.

13.4 Independent surveys to determine the effective of current protocols/levels of risk management -treatments etc and what is best for the future 10 years by users shippers and animal -veterinarian groups and MAF professionals etc could greatly answer the questions we all have moving forward to appropriate legislation and risk management to suit the next decade.

MAF comment: Agree. All current scientific literature, non-compliance reports, and surveillance information is considered in the development of risk analyses and import health standards. Requirements can be updated as new information becomes available or if indicated. An assessment of the new requirements is scheduled for two year's time.

14. MATT WALKER, DONQUEST KENNELS, NEW ZEALAND

- 14.1 The 10 day notice for short stay dispensation:
We have in the past had quite a number of Bitches in season that we are given 4 days notice to ship them out to Oz, In most all cases we have had the dispensation completed in time for the dogs to travel, is this 10 day rule going to be strictly adhered to or can the odd one be rushed through?**

MAF comment: Completed permit and short stay applications are processed in the order received, and every effort is made to process them as quickly as possible. If there is a special situation like the example you give, please submit that information with your request for a short stay agreement.

- 14.2 The time of arrival for inspection:
Is this going to be a vet inspection or will the quarantine officers continue to complete the inspection?**

MAF comment: All cats and dogs will require veterinary inspection. Inspectors will assist with inspection and clearance of cats and dogs from Australia that arrive within the prescribed times.

- 14.3 If flights are delayed due to airline reasons and the animals are to be put into quarantine, at whose cost?**

MAF comment: Generally all costs associated with importing an animal are the importer's responsibility. However, it is not within MAF's jurisdiction to determine the terms of agreement between the airlines and pet importers.

15. NORMA DENNIS, PET EXPORTER, BAHRAIN

- 15.1 Can you please clarify the new regulations for me in Bahrain? I currently am flying the animals BAHRAIN - SINGAPORE – AUCKLAND...By flying them this route there is no requirement for the rabies anti-titre blood test.**

MAF comment: There are no rabies requirements for cats and dogs imported from Bahrain, either vaccination or the titre test, since Bahrain is recognised as rabies free. Model Veterinary Certificate A for Cats and Dogs from Countries or Territories Recognised as Rabies-Free lists all of the requirements and is in the Guidance Document to the Import Health Standard.

- 15.2 Is the six month residency of an animal still a requirement - for instance any animal coming to NZ from Saudi Arabia must do a six month residency in Bahrain - have a rabies vaccination in Bahrain the day after it arrives here from Saudi (regardless of having Saudi rabies vaccinations) - then wait out the six months residency.**

MAF comment: Yes, there is a six month residency requirement. The rabies vaccine is not a requirement for cats and dogs that meet the residency requirement in Bahrain and are imported from Bahrain to New Zealand.

16. DELLA LIN, PRIVATE IMPORTER, HAWAII

16.1 I have reviewed the document above, along with the Draft Guidance Document and the Draft Risk Management Proposal. I understand the Ministry's efforts to ensure the safe Health of animals, agriculture and forestry in New Zealand. However, after review of the information, I believe that Hawaii-- like Australia-- should have fewer mitigation measures due to Hawaii's Health Status. The drafted Standards will place unnecessary additional complexity, paperwork and burden for Pets being imported and exported between Hawaii and New Zealand.

I) Concern: The documents indicate that there are several important exotic viral, bacterial, and parasitic diseases, as well as canine transmissible venereal tumour, which could become established in New Zealand. Several new and revised measures to mitigate these Risks are established. Only one of these appears to be connected to a need to examine Animals post arrival for the delayed appearance of disease—namely exotic ticks.

• Facts: Hawaii, upon consultation of veterinarians in our state, does not have Exotic ticks. We only have the brown tick, which is easily managed through the Topical measures pre-importation. Furthermore, our dogs have short, white coats which would make any improbable ticks easily visible. Finally, our dogs have never had ticks.

II) Concern: The documents also express a concern for the shift in practice from inspector clearance to veterinarian examination.

• Facts: Our dogs have been shipped with the expert efforts of Qualified Pet in Auckland. If necessary, we would be willing to make a veterinarian examination through Qualified Pet during the several hour layover between Auckland and Palmerston North a part of our pets' entrance. This would relieve that burden from your system.

III) Concern: Finally, we have particularly unusual circumstances. We have property and have invested a significant amount of time and money, from our perspective, into the business that we operate in New Zealand. We believe that we have improved the land and contribute to the vitality of the community in the Wairarapa. Our pets are a significant part of our family and investment, and they travel with us several times a year between New Zealand and Hawaii. Because of this frequency, a mandatory quarantine every time is a heavy burden and frankly, impossible. Our record of compliance and health with the importation and exportation of our pets through MAF has been exemplary.

• Facts: We would be open to a separate avenue through which we could achieve quarantine exemption by applying for equivalency to Australia. Please advise us if MAF would approve that route.

The bottom line is that we have invested seven years into being a part of New Zealand. We would like to do everything possible to allow that relationship to continue. The draft standard as it presently stands would have undue hardship and unintended consequences. We respectfully ask you to minimize the mitigation measures for our Hawaii pets travelling to New Zealand.

MAF comment: Noted. Please see response to submission 11.

17. ADRIAN MOODY, PRIVATE IMPORTER, NEW ZEALAND

17.1 We have all become aware recently of the Catdog.gen draft which seeks to address risk of import of diseases and parasites. While all of us in NZ dependent on agriculture certainly applaud diligent border controls in this regard we must also be mindful that special cases of healthy friendly nations should not be carelessly or clumsily handled where in fact risk is miniscule and existing systems have not been found wanting in any way.

Accordingly I request that Hawaii's present status be retained or if Hawaii is to be placed in a grouping then the appropriate grouping would be with Australia.

Historically New Zealand and Hawaii have had minimal difficulties moving animals between each other. This no doubt reflects our similarities i.e. geographically remote islands in the Pacific with unusually few diseases and parasites. I am unaware of any change in that status for either country. It should be noted that although Hawaii is one of the United States it is distinctly different from the mainland States in terms of disease and parasites and has strict border controls for animals travelling between itself and the mainland.

Accordingly it can still in my opinion continue to be regarded as a very low risk location and I question the merit of lessening its status as it is in fact virtually equivalent to New Zealand in terms of disease/parasite risk. I note Australia is accorded minimal restrictions in terms of animal movement between our countries but would suggest that Australia has considerably more undesirable species than Hawaii so it is illogical to impose more restrictions on Hawaii. The draft risk management CATDOG document highlights a number of undesirable species/diseases but it seems of these Hawaii has only the brown tick. Note that both Australia and New Zealand presently have brown ticks so Hawaiian imports pose no threat of bringing an undesirable new entrant.

Therefore I request that Hawaii's present situation be retained to enable continued simple animal movement between us.

Like all New Zealanders involved in agriculture I certainly agree border controls to protect our minimal disease status are desirable. But as noted in the case of Australia where the departure point of the visiting animal is of equivalent or superior status to New Zealand risks can be protected against by the present system which has been serving us well!

MAF comment: The brown dog tick (*Rhipicephalus sanguineus*) is not present in New Zealand.

We recognise that Hawaii's animal health status is different from the rest of the USA in terms of rabies, and therefore cats and dogs from Hawaii are not required to complete the vaccination and titre testing requirements for rabies. Otherwise there is no difference in the import requirements for cats and dogs from Hawaii and cats and dogs from the mainland USA. Cats and dogs from Australia do have fewer test and treatment requirements than Hawaii, as Australia is free from *Brucella canis* and a subspecies of leptospirosis that affects dogs, as well as rabies.

Measures may be proposed and agreed between government authorities, and any proposal for equivalence made on behalf of a government authority is given full consideration based on the information provided.

Please also see response to submission 11.

18. LOUISE MOODY, PRIVATE IMPORTER, NEW ZEALAND

18.1 I am writing to support the request that DOGS FROM HAWAII be placed in the same category as Australia and be allowed to travel to New Zealand without an additional 10 day quarantine.

Specifically, the Jack Russell terriers owned by Drs Lee Guertler and Della Lin are experienced travellers and not fractious animals. They have short white hair making external examination a practical and simple procedure, and are used to being examined on entry to New Zealand by MAF staff. They travel to New Zealand with their owners multiple times yearly, remaining for 4-6 weeks each time. All NZ MAF import regulations and animal examinations have been carefully conducted in Hawaii prior to every visit to New Zealand. There have been no incidences of external parasites or problems relating to the dogs with regard to any of the other diseases on the MAF watch list. The proposed double dose protocol of a topical agent would result in a 100% kill of the common brown dog tick, which is the only tick found in Hawaii.

Placing these dogs in a 10day quarantine so the proposed mandatory examination by a veterinarian rather than a MAF inspector can be conducted will result in them being quarantined 30-40 days every year and would be an undue hardship. Treating them in the same manner as dogs arriving from Australia would create no biologic risk to NZ-MAF since Hawaii quarantine and the professional standards of Hawaii veterinarians have always been at the highest level.

Therefore, I am formally asking that HAWAII BE PLACED THE SAME "NO ADDITIONAL QUARANTINE" STATUS AS AUSTRALIA.

MAF comment: Noted, please see response to submission 11.

19. BRENT MOODY, PRIVATE IMPORTER, NEW ZEALAND

19.1 I understand how important it is to protect the borders of New Zealand, however I see absolutely no merit in requiring a 10 day quarantine of dogs travelling from Hawaii to New Zealand given that Hawaii has only the common brown dog tick which under the current NZ MAF import regulations and animal examinations does a perfect job of thoroughly examining animals and effectively protecting our borders. I believe a 10 day quarantine would place a great deal of undue hardship on the dogs with no foreseeable difference in effectiveness to that of the current NZ MAF import regulations and animal examinations, not to mention the horrific extra expense for those persons that travel between Hawaii and NZ regularly with their dogs. Treating them in the same manner as dogs arriving from Australia would create no biologic risk to NZ-MAF since Hawaii quarantine and the professional standards of Hawaii veterinarians have always been at the highest level.

I would therefore formally like to support retaining a system for transport of

dogs between Hawaii and New Zealand that does not mandate post arrival quarantine.

MAF comment: Noted, please see response to submissions 11.

20. WENDY MOODY, PRIVATE IMPORTER, NEW ZEALAND

20.1 I have been involved in the development of a farming operation in the Wairarapa with Hawaii residents Lee Guertler and Della Lin for the last 7 years. They have been required by the NZ Overseas Investment Commission regulations when purchasing their farm to substantially improve the farm and to provide ongoing employment for local workers in order to have the privilege of owning land in NZ. This has been a lengthy and expensive process.

One of the main reasons for Lee and Della to invest in NZ was because they could bring their dogs out to the farm with them when they come to visit and enjoy the freedom of life on a farm which they don't have access to in Hawaii.

Lee and Della have adhered to all the NZ requirements that were set out for them to enjoy this lifestyle.

I think it would be very unfair if they were penalized now by not being able to freely bring their dogs with them when it appears that the status of animal health between Hawaii and NZ has not altered which means that the quarantine requirements are actually not necessary.

I would therefore like to support retaining the present system for transport of dogs between Hawaii and New Zealand.

MAF comment: Noted, please see response to submission 11.

21. DR. GRANT WILLIAM CLARKE, AGRICULTURE, FISHERIES, AND CONSERVATION DEPT., HONG KONG

21.1 Thank you for the opportunity to comment on your draft IHS for dogs and cats, and associated documents.

AFCD supports the following requirements:

- to only require one FAVN or RFFIT test prior to export rather than two
- two treatments for ectoparasites is far more effective that just one treatment within 4 days of shipment
- the removal of testing for hookworms and use of two treatments
- the PCR for Babesia gibsoni and that 2 samples must be taken 30-37 days apart; the removal of the blood smear is logical taking into account current diagnostics available

- The deletion of the statutory declaration as this posed numerous problems for certain owners

- the removal of the requirement to state the drug dosages for many of the treatments; this removes the possibility for typographical errors
- the requirement for just 10 days of post-arrival quarantine rather than 30

days.

MAF comment: Noted.

We have been informed by New Zealand Customs that the owner declaration is required in addition to the veterinary declaration.

21.2 AFCD would suggest that the testing/treatment for Babesia canis is extended for all countries rather than just South Africa. Although Babesia canis rosi has only been reported in South Africa, most countries do not have import requirements specific to this subspecies of Babesia canis so it can be assumed that many countries may have this parasite. This would be consistent with MAF's measure for Babesia gibsoni where all countries are required to test.

MAF comment: According to the *Import Risk Analysis: cats, dogs and canine semen*, ticks already present in New Zealand can potentially spread only one of the three subspecies of *Babesia canis*. This is *Babesia canis rossi*, which is why dogs that are imported from South Africa, or have ever been to South Africa, must be treated or tested for *Babesia canis* prior to import. As New Zealand does not have ticks that can transmit *Babesia canis vogeli* or *Babesia canis canis*, these subspecies were not identified as risks and therefore risk management is not required.

From the Import Risk Analysis: *Babesia canis* has three antigenically distinct subspecies that are transmitted by various tick species:

- *Babesia canis canis*, *Dermacentor reticulatus*, widespread in Europe and foci in Asia.
- *Babesia canis vogeli*, *Rhipicephalus sanguineus*, Europe, Australia, Japan, Brazil, Africa, USA.
- *Babesia canis rossi*, *Haemaphysalis elliptica*, southern Africa (the most virulent of the subspecies).

21.3 AFCD cannot comply with the requirement of an official veterinarian and a local veterinarian inspecting the animal within 24 hours of the time of export. In Hong Kong the flights to New Zealand depart at 7pm, and animals need to be at the airport 4 hours in advance of the flight. To have the animal inspected by a local veterinarian and complete the certification, and then have the animal inspected by an AFCD veterinarian, check the certification and complete the certification, and then the animal has to travel to the airport, is not physically possible. AFCD would kindly request that the 24 hours is extended to 48 hours as is the current practice.

MAF comment: Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

21.4 AFCD would also request that the inspection be completed solely by the local veterinarian (as is the case for all other countries, including Australia) and AFCD only check and countersign the documentation, and then apply the seal to the cage (as is the case for Australia). The identification of the animal will

be verified by AFCD airport staff and then the animal placed into the container and sealed (see below). AFCD has the up most confidence in the inspections completed by our local veterinarians.

MAF comment: MAF relies on the official assurance of the government veterinary authority of the exporting country. Veterinary Certificate A must be completed by either an official government veterinarian or a veterinarian authorised to provide export certification on behalf of the government veterinary service. It must then be endorsed by an official government veterinarian, and Veterinary Certificate B must be completed by an official government veterinarian.

21.5 AFCD understands that MAF has had some issues with animals arriving with ticks in the past and would like to know if any of those consignments originated from Hong Kong. If so then we would like to follow up these cases as we want to ensure the accuracy and integrity of our certification. Please can MAF confirm this?

MAF comment: There are no non-conformance reports of tick incursions from Hong Kong.

21.6 The current practice is that AFCD have been only sealing the container at the airport as the official veterinarian is not located at the airport and AFCD do not have enough resources to have official veterinarians located at the airport. So the seal number is noted on the official documentation but an additional certificate is provided by AFCD airport staff. This certificate states that the animal's microchip has been scanned and is correct, after which the animal is placed into the container and it is sealed.

MAF comment: Noted

21.7 These draft requirements are far more pragmatic than the current requirements and achieves the same risk management levels compared to the current measures in place but for far less cost to the exporter. This will result in many more people wishing to take their pets (which some consider children) to New Zealand when they relocate there from Hong Kong. AFCD appreciates this.

MAF comment: Noted

22. CHUCK PETTIS (CHARLES J PETTIS), PRIVATE IMPORTER, COOK ISLANDS

22.1 I believe the draft proposal, if it should come into affect will become much more attainable to us but still maintaining the standards you require.

MAF comment: Noted.

23. DENISE CLARK – SHADO LANS QUARANTINE FACILITY

23.1 The Risk Management Dogs and Cats quote the World Trade Organisation Article 3.1 as justification for the review of the current Import Health Standards. Article 3.3 of the WTO states – where measures providing a higher level of protection than international standards can be applied, if there is scientific justification, or if there is a level of protection that the member country considers is more appropriate following a risk assessment. The above Article should be applied to New Zealand. New Zealand holds a truly unique position in the world, in that our isolation has kept us free of a number of

pests, which have the potential to adversely affect our economy in the tourism and agricultural sectors. By relaxing our border security with the adoption of the proposed Risk Management, we potentially open our doors to a number of NZ MAF identified ectoparasites. New Zealand is not a part of Europe, Asia or the USA, where crossing a border is merely a matter of crossing the road. We are an island nation and this in itself, coupled with our vigilant Border security has contributed to our clean, green image. Support for the quarantine period to be 21 days rather than the 10 days as in the Draft Risk Management Document. The mitigation of risk, particularly from the Brown Dog Tick, cannot reasonably be completed in a 10 day time frame as given in the Risk Management Proposal. The Analysis on page 29 paragraph 4 states that Ticks can be very small before feeding on the animal and are difficult to find on long-haired or dark-coloured coats. Post-arrival quarantine provides a controlled and calm environment for conducting thorough inspections and allow for multiple inspections over time. This paragraph identifies that a) Ticks are very small and difficult to find and b) that thorough inspections are needed over time.

Ticks 31.1 Hazard identification of the Risk analysis, paragraph one. For example Rhipicephalus Sanguineus (Brown dog Tick) may take up to 21 days to engorge. The 21 days engorgement is also confirmed in numerous articles on these ticks.

Ticks Risk Assessment: 31.2.1 – Since dogs are a significant pathway for the introduction of ticks, entry is assessed to be non negligible. 31.2.3 3) The effects on the health of humans and animals may be severe. If an exotic tick were to establish, eradication would be difficult and expensive. The consequences are therefore assessed to be non-negligible.

Lyme disease is the most common disease transmitted by animals to humans and is carried in the jaws of the Brown dog Tick. This is a blood disease and is common in Europe and the USA.

(Editor's note; Lyme disease (*Borrelia burgdorferi*) is a serious disease affecting many organ systems and is spread mainly by another type of tick, Ixodes.)

The Risk Analysis identifies the need for controlled inspections over time to find ticks on imported pets. 10 days is not “over time”, but in fact an unacceptably short period of time, when it has already been identified by the authors of the Risk Management that ticks take 21 days to engorge. Ticks start off their adult life stage the size of a pin head and are extremely difficult to locate until they are engorged.

31.3.1: However, there is no known acaracide, or acaracide combination, that is consistently 100% effective for all ticks for any time period. An area of particular concern with fipronil was the poor control of ticks in the ears of dogs. Ticks may be resistant to a range of acaracides. Tick inspections are therefore an important adjunct to acaracide treatment since treatment alone cannot be relied upon. This is supported in the MAF “Surveillance” Magazine – The NZFSA Verification Agency supervising veterinarian at a quarantine facility in Auckland reported the discovery of a live tick on a three-year-old male Labrador dog recently imported from Malaysia. The dog had been treated with fipronil prior to export, in accordance with the Import Health Standard. The tick was removed and further treatment with fipronil spray was undertaken. A further search of the dog two days later revealed more live ticks, and the fipronil treatment was repeated. A third search found still more live ticks, and treatment was switched to permoxin and permethrin. One more tick was surveillance 37 (4) 2010 37 found two days later but further searches

did not detect any more. The dog's environment in the quarantine facility was treated with fipronil and permethrin throughout this period, and bedding used was destroyed. Further investigation with the dog's importers indicated that no personal effects had been imported that might harbour ticks. The dog was re-tested for Babesia, with negative results. All these ticks were identified as *Rhipicephalus sanguineus*, the brown dog tick.

Also from the MAF "Surveillance" Magazine is a very comprehensive article entitled "Exotic Ticks and Fleas: A Growing Biosecurity Risk?" A supporting Submission – "The Case for Quarantine of dogs to reduce the risk of ticks entering New Zealand", written by Mr AGC Heath, Senior Scientist, AgResearch, 17 August 2010.

3. The "Surveillance" Magazine 23(4) 1996 contains a table which identifies hard ticks, ticks established in NZ as using the Brown Kiwi as hosts. From The University of Florida Department of Entomology and Nematology A fully blood-fed female brown dog tick can lay up to 5000 eggs; these ticks are tolerant of a wide range in conditions.

(Editor's Note from RA: There are nine tick species present in New Zealand, most of which are found on wild birds (Heath 1977). The cattle tick *Haemaphysalis longicornis* is the only one of economic importance to livestock and agriculture (Loth 2004).)

Summary

The present regulations allow for 30 days quarantine with a treatment of an acaricide within 72 hours of entry into New Zealand. The proposed changes take the quarantine period to 10 days with no treatment on arrival into New Zealand. This is an area of great concern as the minimisation of the quarantine requirements does not allow for a reasonable period to find ticks that are not engorged. The above sources have endorsed the undisputable fact that there is no known treatment that is 100% effective and this does not allow for the fact that if the pet's owners bath their dogs 48 hours either side of the treatment they cancel out any effectiveness that the treatment may have had and many of the dogs owners like their dogs to be clean prior to their travel to their new country. If the Brown Dog Tick is allowed to establish in New Zealand the consequences to our economy, pets and the victims of tick bites would be due to negligent reasoning that the effective quarantine regulations and time period currently in place, should be replaced and reduced to a dangerously shortened time period with lesser treatments all at the behest of a misconstrued WTO document.

MAF comment: It is a high priority to keep exotic species of ticks out of New Zealand. Therefore the risk management measures for ticks have been increased above the current requirements as follows:

- Two pre-export treatments, rather than one, must be applied to the animals at a specific interval of time. This will help reduce parasites in the home environment, reduce the risk of the animal being infected with a disease carried by ticks shortly before arrival, and allow time for the treatment to reach full effect.
- These treatments must be done by a veterinarian. This increases assurance that the treatments were done at the correct times and that they were applied according to manufacturer's recommendations.

- Treatment will not be restricted to one specific product, as it is in some of the current Import Health Standards. This has been changed, as products may lose their effectiveness over time. The requirement allows use of one or more products registered in the country of export and recommended by the veterinarian for flea and tick control.
- The veterinarian must certify that the animal was inspected and found to be free of ticks and fleas at both visits. If the animal is found to have ticks or fleas the treatment series must be repeated.
- The final inspection must be done within 48 hours of shipment (previously within 96 hours).
- The post-arrival inspection in New Zealand will be done by an official government veterinarian, along with an Inspector. Although Inspectors are trained and skilled at parasite inspections, veterinarians have more training in examining animals and recognising problems.

All dogs and cats, except those from Australia, will be directed to post-arrival quarantine for a minimum of ten days, or until they have complied with all requirements. This will result in a much larger percentage of imported cats and dogs going into quarantine. Previously only cats and dogs from countries with rabies measures were sent to quarantine, comprising approximately 20% of all imported cats and dogs. Any cat or dog from Australia found to have ticks or fleas on post-arrival veterinary inspection will be sent to a quarantine facility, as will any fractious dog or cat that cannot be adequately examined.

As no single measure is 100% effective, the risk management for ticks (and fleas) requires a combination of measures, including treatments over time, pre-export and post-arrival inspections and quarantine for most imported animals.

Periods of quarantine considered ranged from 0 to 21 days. The 10 day period will allow the engorgement and detection of the vast majority of ticks that may still be present. There are multiple species of ticks which have been identified as risk organisms, with highly varied life cycles. Feeding (engorgement) of soft ticks typically takes less than one hour, while for hard ticks “blood-feeding typically takes between 4 and 6 days after which they drop to the ground...” (Veterinary Parasitology, Taylor et al, Blackwell Publishing, 2007). Twenty-one days represents a long extreme of the range of feeding times. If quarantine was the only risk management measure for ticks a case for 21 days of quarantine could be made.

24. KEIKO FUJIBAYASHI, NEW ZEALAND EMBASSY, JAPAN

24.1 With regard to Draft Import Health Standard for Dogs and Cats, the Animal Health Division of Japan MAFF contacted us and asked the following questions.

MAFF Animal Health Division said they received the SPS Notification (G/SPS/N/NZL/447) and examined the draft IHS for dogs and cats, and found that they will not be able to comply with some requirements in the draft IHS.

1. BRUCELLA CANIS TESTING FOR DOGS

MAFF Animal Health Division said a rapid slide agglutination test (RSAT) and a cytoplasmic agar gel immunodiffusion test (CPAg-AGID) cannot be conducted in Japan as diagnostic test kits for RSAT and CPAg-AGID are not available in Japan. Instead, MAFF Animal Health Division would like to propose to carry out a tube agglutination test only and confirm a negative result. The diagnostic kit for the tube agglutination test used in Japan sets the negative criterion being "not more than x160". As New Zealand does not set a negative criterion, is it acceptable for NZMAF if MAFF Animal Health Division uses the positive/negative criteria used in Japan for the tube agglutination test?

MAF comment: Although the TAT could possibly be used as a screening test, our laboratory expressed concern about the cut-off of 1/160 based on the information provided. Generally, our laboratory recommended testing from about 1/40 serum dilution and retesting any reactions below 1/160 two weeks later. Greene's Infectious Diseases of the Dog and Cat cites <1/50 as negative. Based on the information provided, a negative TAT at 1/160 does not meet the Import Health Standard.

24.2 If NZMAF recommends or use any diagnostic test kits for RSAT and CPAg-AGID, MAFF Animal Health Division would like to know.

MAF comment: MAF's Investigation and Diagnostic Centre uses B. canis CARD RSAT, D-Test CD, Synbiotics.

24.3 HEARTWORM (DILOFILARIA IMMIRIS) TREATMENT AND TESTING FOR DOGS

In the draft IHS, "Dogs six months of age or older on shipment have been subjected to a heartworm antigen ELISA test with a negative result within 30 days of shipment" is required, but in Japan diagnostic test kits for heartworm antigen ELISA are not available. Instead, MAFF Animal Health Division would like to request NZMAF to approve a microfilariae concentration test as in the current IHS.

MAF comment: The heartworm antigen test is a much more sensitive test than the microfilariae concentration test, as described in the 2009 Import Risk Analysis: cats, dogs and canine semen. The microfilariae concentration test was not included as a risk management option for heartworm due to its low sensitivity. Therefore we require the heartworm antigen test. NOTE: It is acceptable to send tests offshore if your government veterinarians will certify the results. For example, some countries send samples to DEFRA's laboratory if they do not have testing capacity onshore.

24.4 If NZMAF recommends or use any diagnostic test kits for heartworm antigen ELISA, MAFF Animal Health Division would like to know.

MAF comment: MAF's Investigation and Diagnostic Centre uses heartworm antigen ELISA, DiroCHEK, Synbiotics.

25. MARION WILSON, VETERINARIAN, NEW ZEALAND

25.1 Short Stay provision: The short stay provision within the import health standard for Australia should be extended to 30 days and should apply to all approved countries. The risk from “recent infection” is no different in dogs visiting these countries for 30 days than for any other dogs being imported into NZ. Blood tests would not be required as there would have been insufficient time for seroconversion in the event of infection in that time. Treatments would be completed as per the IHS or in post arrival quarantine depending on the length of time overseas

The Import Health Standard should deliver effective management of the risks identified in the risk analysis consistently & logically without being unnecessarily restrictive to international movement of dogs & cats. The measures required to achieve this, by way of blood testing & treatment should be practical without making compliance unreasonably difficult to complete. I believe the draft IHS for dogs & cats on the whole provides a simpler & more rational management of the risks to NZ from imports of cats & dogs. The changes to post arrival quarantine represent a sensible safety net to protect NZ.

MAF comment: Noted – refer also to 25.6

25.2 Rabies: The protocol for the timing of Rabies vaccination & antibody titre testing vary significantly between the requirements in part B of the IHS paragraph 13 d & part C paragraphs 33 & 34. It seems illogical to have two different protocols to manage the same issue.

MAF comment: Sections 33 and 34 apply to cats and dogs residing in countries where rabies is absent or well-controlled, and follows the OIE recommendations.

Section 13d applies to New Zealand cats and dogs travelling to countries with rabies. By completing the requirements in this section before leaving New Zealand, the animal is eligible to return to New Zealand in less than six months, i.e., no waiting period is required. Dispensation is given for the residency requirement in the country of export with evidence of continuous protection against rabies from the time they left New Zealand.

If the timing requirements were the same as those in Section 33 and 34, the periods covered may lapse before the animal is reimported, continuous protection would not be documented, and a longer time period would be required to prepare for their return. The rabies vaccine currently used for export purposes in New Zealand is registered for one year duration of immunity. If it is given more than six months prior to export it will not cover the period of six months post-export. The time allowance for the titre test has been changed to “no greater than 18 months prior to leaving New Zealand”, so it will be valid for at least six months after the animal is exported.

25.3 External parasite control: External parasite control has 2 objectives remove unwanted external parasites per se to remove them as vectors of disease. With reference to the latter, the 2009 Import Risk Analysis suggests that the aim should be to ensure freedom from tick infestation for 30 days prior to

export to manage the risk of recent infection within that period when animals would not be identified by seroconversion to tick borne diseases. However the regime, in the IHS, for achieving this philosophy appears to be flawed “First treatment within 30dys of export & at least 2 wks before the second treatment which is to be given within 4 days of shipment” – practically this translates into the second treatment being done at the vet examination within 24 hrs of shipment and the first done 14 days earlier i.e. within 15 days of shipping. This means that a tick free period in the 2 weeks prior to blood testing, to minimize the risk of recent infection, is not achieved

MAF comment: The timing and interval of the two ectoparasite treatments complies with the risk management options. Regarding serological tests for diseases transmitted by parasites, ideally there would be no exposure to parasites for at least three weeks prior to testing. For practical reasons importers request that the timing of the *Babesia* test be extended even further from the date of shipment, which would require the first treatment to be given even earlier. On the other hand, an expert parasitologist recommended that the first of two treatments be scheduled two weeks before shipment with the second treatment given just prior to shipment to reduce the likelihood of the animal carrying live ticks or fleas to New Zealand.

The requirement in the import health standard gives a range of time for the first treatment being given between 16 and 30 days pre-export, along with an inspection and other additional measure not required in the previous requirements.

25.4 Babesia canis: This organism is identified in the IHS as requiring risk management but in the model certificates there are no apparent controls except from S Africa, other than that afforded by external parasite control. Is there a reason for this?

MAF comment: According to the *Import Risk Analysis: cats, dogs and canine semen*, ticks already present in New Zealand can potentially spread only one of the three subspecies of *Babesia canis*. This is *Babesia canis rossi*, which is why dogs that are imported from South Africa, or have ever been to South Africa (model veterinary certificates have been updated to include note of this), must be treated or tested for *Babesia canis* prior to import. As New Zealand does not have ticks that can transmit *Babesia canis vogeli* or *Babesia canis canis*, these subspecies were not identified as risks and therefore risk management is not required.

From the Import Risk Analysis: *Babesia canis* has three antigenically distinct subspecies that are transmitted by various tick species:

- *Babesia canis canis*, *Dermacentor reticulatus*, widespread in Europe and foci in Asia.
- *Babesia canis vogeli*, *Rhipicephalus sanguineus*, Europe, Australia, Japan, Brazil, Africa, USA.
- *Babesia canis rossi*, *Haemaphysalis elliptica*, southern Africa (the most virulent of the Subspecies).

25.5 Timing of export blood tests: A compromise has to be reached between the ideal situation & the practical situation with regard to all blood tests & treatments. The time frame in which overseas laboratories will guarantee a turn around has to be taken into account as well as having the blood taken, freighting it and receiving the report back in order to do the final certification within 24 hrs of export. In practical terms, where the guaranteed laboratory turnaround is 7 working days* plus 2 days to have the blood taken & be received at the lab plus 2 weekends which become part of the time frame and then get the final examination & certification done in the last 24 hrs adds up to a schedule of 14 days with no room for error. I recommend “within 14 days”

should be changed to “within 16 days” to help with the nightmare of meeting the import protocol. *This is based on Weybridge CVL turnaround time of 3 yrs ago – I am unaware if this has changed or what the situation is in other countries.

MAF comment: The timing for *Babesia gibsoni* testing has been extended from the current requirement of 10 days to 16 days, in response to feedback such as yours.

25.6 Short stay provision: In the draft IHS there is provision for 10 day Short Stay to Australia which has been include presumably because of demand for this facility. Increasingly dog owners want to take their dogs overseas to compete at shows, dog trials and other dog sporting events staying only a short time overseas. To accommodate this situation I believe that provision should be made within the IHS for stays of up to 30 days to all approved countries. This would require a model certificate be drawn up to cover this situation which would then remove the need for dispensations to be sought on a case by case basis – simplifying the system both here and overseas. Currently if dogs go overseas for less than 14 days it is impossible to comply with the draft IHS & dispensations would be required & for those staying up to 30 days the draft IHS is unscientific

The particular situation for these dogs is:

a) Their health status is known prior to export (provided they have been resident in NZ for 6mth prior)

b) Even at the maximum stay of 30dys they are not going to show positive serology with testing within 14 days of shipping therefore blood tests are of no value

c) It is important to remember that the risk factors for these dogs are no different to any dog being imported into NZ from any approved country in that “possible recent infections” i.e. within the 30 days prior to shipping - either prior to blood testing or between blood testing & export presents a challenge for risk management. The draft IHS has adopted measures which by experience & changes to the previous protocol minimize these risks. The post arrival quarantine period provides something of an additional safety net

Taking account of the above, a practical model certificate can be produced which ensures a consistent logical approach to short stay situations of up to 30 days for all approved countries. This removes the need for time spent on case by case assessments & dispensations which also create issues with certification overseas

This certificate should include:

Continuous residency in NZ for 6 months prior to the commencement of the short stay

Internal parasites

Treatment within 24 hrs of leaving NZ & second treatment within 4 days of shipment

External parasites

Treatment within 24 hrs of leaving NZ & second treatment within 4 days of shipment

Brucella canis testing

Blood test not required because will not have seroconverted

Recommend include an advisory leaflet on the disease and how to minimize the risk of infection

Heartworm

Treatment within 4days of shipment

Blood test not required

Babesia gibsoni
Blood testing not required
Risk management by external parasite control
Leptospirosis
Treatment within the short stay or post arrival quarantine
Examination
As for standard certificate
Post arrival inspection & quarantine (10day) would apply, except for Australia
For countries where Rabies is absent or well controlled the requirements for
Rabies management in the draft IHS would apply to short stay dogs

MAF comment: The risks that are most challenging to manage in a “short stay” certificate are *Brucella canis* and *Babesia gibsoni*. Australia is free of *Brucella canis*, and has a very low incidence of *Babesia gibsoni*.

Requests for dispensation for assistance dogs or working dogs travelling to other countries for short periods of time are given consideration and must include verifiable risk management measures for all identified risks. We acknowledge that there are some limitations to serological tests in terms of detecting recent exposure to infectious diseases.

25.7 Housekeeping matters: Model certificate short stay Australia reference is made to dispensation for Babesia canis testing – should that be gibsoni

Model certificate – Rabies absent or well controlled
Heart worm testing & treatment do not appear in same paragraph as they do in the other country certificates – logically they should appear together

MAF comment: Edited-thanks.

26. JULIE CLAYTON-WEST, PRIVATE IMPORTER, NEW ZEALAND

26.1 My husband and I would like to register our support for any changes MAF are contemplating regarding the quarantine rules for cats and dogs entering New Zealand.

MAF comment: Noted.

27. JOHN BECKETT, EXECUTIVE DIRECTOR, BOARD OF AIRLINE REPRESENTATIVES NZ

27.1 BARNZ members have a direct interest in this standard through member airlines transporting Cats and dogs into New Zealand from Australia and from other countries from which movement of these animals to New Zealand is permitted. Air NZ and Menzies, who are the cargo terminal operators (CTOs), are also members of BARNZ. The animals are moved from the aircraft to the CTOs’ premises before leaving the airport.

This submission has been agreed by the key BARNZ members. Individual members may, however, also make submissions which could provide MAF with more detailed concerns or comments.

We assume that the reason for tightening up the standards and introducing the compulsory vet clearance is based on a researched risk analysis which

shows that this change is necessary. Certainly from the airlines' and CTOs' point of view the current practice of clearance on arrival (24 x 7) by a MAF officer has worked well. If Vet clearance is to become the standard, we request that consideration be given to the Vet service being made available outside the advertised operating hours on the basis of advanced notice with a cancellation fee if the animal is not shipped.

MAF comment: The scheduled hours of arrival for border clearance apply only to animals imported from Australia. Animals from all other countries may be directed to a transitional facility by an Inspector regardless of their time of arrival.

Live animal inspection for import and export purpose is conducted by veterinarians in many countries. In addition to the inspection for external parasites, all entire dogs must also be inspected for Canine Transmissible Venereal Tumour. The scheduled hours are based on flights scheduled from the major ports in Australia to the major ports in New Zealand, veterinary resources, and historical data on the number of animals from Australia arriving at the three major ports in New Zealand, and should accommodate the movement of cats and dogs from Australia. It has been agreed that the proposed system will be monitored closely, and services will be adjusted or expanded if necessary.

If there is adequate demand for animals to be cleared out of inspection times, the option of charging owners an additional fee for pre-arranged out of hours charging could be considered.

27.2 We seek an assurance that MAF has worked with the Customs Service in developing this new procedure so that either Customs will be on hand to clear incoming animals before they are moved to a Transitional Facility (TF) or the TF will be licensed as a Customs Bonded Facility thus allowing the animal to be moved from the CTO's premises to the TF on arrival.

MAF comment: MAF has communicated with New Zealand Customs regarding the proposed changes.

We have been informed that one transitional facility has already been registered as a Customs Controlled Area, allowing them to transfer animals directly from the port of arrival to the transitional facility. Customs fees are charged and collected before the cat or dog is given biosecurity clearance and released from the transitional facility. Each transitional facility can apply to be registered as a Customs Controlled Area through their local Customs office. This information has been given to all transitional facility operators.

27.3 The change to requiring a vet clearance for cats and dogs from Australia and restricting the hours at the NZ airports (coupled with no vet services over the weekends or on public holidays) will cause logistical problems and result in additional costs for the importers. Animals arriving from Australia when a vet is not on duty will need to be moved to a TF. An issue will be liability for the costs of quarantine if an aircraft disrupt or delay causes a flight, which was programmed to arrive within 'vet hours', to be late — given that the transport has been pre-paid.

MAF comment: See note on selection of hours above. We acknowledge that disruptions occur, but cannot predict such occurrences. All constructive feedback will be appreciated and MAF will make every effort to work with the airlines and shippers to facilitate the new requirements.

Regarding additional costs: it is generally the importer's responsibility for all costs, however, it is not in MAF's jurisdiction to determine the arrangements between importers and shippers.

27.4 We point out that the very restricted hours for vet availability in Christchurch and Wellington will mean that up to 50% of incoming trans-Tasman flights will arrive outside of vet hours. This will restrict the number of flights that people can bring or send their pets on without incurring extra costs and delays through quarantining.

MAF comment: Agree, there will be a restriction. Some countries restrict the port (airport) of entry to one airport. This was considered as an option but seemed very restrictive, and limited hours was considered better than no clearance at Christchurch and Wellington. The hours were selected to accommodate flight from the major ports in Australia to the three major ports in New Zealand.

27.5 The requirement that uncleared animals cannot travel on the same domestic aircraft as domestic animals which are accompanying their owners (or as cleared animals) will create significant problems for domestic air carriers because they cannot be sure that a domestic passenger travelling from, say, Auckland to Wellington will not turn up with their cat or dog to be transported with them. Domestic carriers who are transporting uncleared animals would be put in the position of having to either decline the carriage of the domestic or the cleared animal, or of adopting a policy of not carrying uncleared cats or dogs on domestic flights because it would not be possible to guarantee an 'animal free' flight for an uncleared animal. If the latter policy were adopted, which would seem to be likely, it would lead to extra pressure on the Auckland TFs.

MAF comment: This has been brought to our attention, and the operational issues are being worked through with domestic airlines and Inspectors.

27.6 In this regard, we are concerned that the TFs in Auckland may not be able to cope with the additional numbers of animals resulting from the adoption of the above policy and the arrivals ex Australia outside Vet weekday hours. We ask that, before the new system is introduced, an analysis is done based on numbers of imported animals over the last couple of years.

MAF comment: We have considered the historical numbers of animals arriving from different countries, and acknowledge that these numbers may change following the change in requirements. A permit to import is required for cats and dogs from all countries except Australia. The permit is not issued until the animal has a confirmed reservation at a transitional facility. Although more animals will be required to enter quarantine, the 10 day quarantine period will be significantly shorter than the current requirement of 30, 60 or 120 days, so it is anticipated that there will be room to accommodate non-compliant animals as well as animals with quarantine bookings.

27.7 Our understanding is that the responsibility of the airlines under the proposed regime will be to advise MAF at least 72 hours before the arrival of the animal in New Zealand. The accompanying documentation is the responsibility of the shipper, and the booking for the TF and land transport arrangements from the CTO's premises to the TF is the responsibility of the importer.

MAF comment: The importer or their designated agent, usually a pet exporter, is responsible for all aspects of importing an animal. If there is agreement between the importer or their agent and the airline that the airline will assume responsibility for providing advance

notification of arrival, that is acceptable. However, it is not within MAF's authority to place this requirement on the airlines.

- 27.8 For animals from Australia which are cleared at the border by a vet and are going to move to a domestic flight, the importer will continue to take the responsibility to arrange Customs clearance and care of the animal until it is delivered to the domestic flight.**

MAF comment: The importer or their agent would be responsible unless other arrangements have been made.

- 27.9 CONCLUSION: We believe that the new system will be workable, provided that:**
- **MAF can explain and justify the change to those shippers, passengers and importers who will experience increased costs and frustrations as a result of the proposal; and**
 - **Our understanding of how the new system will work and, in particular, the responsibilities of the various parties as spelled out in item 7 above, is correct; and**
 - **The TFs will be adequate for the task; and**
 - **The NZ Customs Service establishes the TFs as Licensed Bonded Facilities; and**
 - **The shippers and importers are well briefed and understand their roles and responsibilities. Having said that, we are bound to point out that, in terms of facilitation, the proposal represents a significant step backwards and there are likely to be complaints from owners of the animals. In this context, we ask that further consideration be given to the Vet Service being made available outside the advertised operating hours on the basis of advanced notice with a cancellation fee payable by the importer if the animal is not shipped.**

MAF comment: Noted

28. LAETETIA ROELOFSE, PRIVATE IMPORTER, SOUTH AFRICA

- 28.1 Just a quick note to say that support the proposed changes 100%.**

This will not only make it more affordable for persons wishing to immigrate to New Zealand, but also ensure a quicker reunion of the dogs and cats with their owners.

Well done on this great initiative!

MAF comment: Noted

29. MIKE MUNE, DANDY DOGS, NEW ZEALAND

- 29.1 Some details of the proposed new Import Health Standards for cats & dogs are welcomed, but as noted below, some areas must be readdressed.**

Quarantine period of 10 days from all acceptable countries except Australia.

Although this seems to be a way to simplify requirements, it could expose NZ to risk from some areas (such as certain Ticks), as 10 days is less than the initial larvae period for some ticks. A reduction in quarantine time could be

warranted for a number of countries, however applying the same time to virtually all countries seems a retrograde step.

With reference to the countries that currently have no quarantine requirement, what risks have prompted this change?

MAF comment: The biosecurity clearance scenarios considered ranged from clearance of all compliant cats and dogs at the border to post-arrival quarantine for all imported cats and dogs. It was agreed that it is a high priority to have official veterinarians undertake all physical inspections. This is a significant shift from current practice, where cats and dogs that do not require post-arrival quarantine are cleared at the border by inspectors, and animals in quarantine are cleared by official veterinarians.

Post-arrival quarantine requirements were previously based on rabies risk mitigation, although they also provided a “safety net” for other risks. The risk mitigation measures for rabies no longer include quarantine. However, the value of post-arrival quarantine was considered to allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health.

The final recommendation that cats and dogs arriving from all countries except Australia be sent to post-arrival quarantine for a minimum of 10 days was made after extensive review of the risk management options, veterinary resourcing, statistics of animal arrivals, and current government-to-government agreements.

Cats and dogs from Australia have fewer risk mitigation measures and therefore fewer documentation requirements due to Australia’s health status. The documentation check and physical inspection for cats and dogs from Australia will be conducted at the border. Any animal that is not compliant with the requirements, or is found to have fleas or ticks; will be sent to post-arrival quarantine. Fractious cats or dogs, and those arriving outside of the scheduled time for veterinary inspections, will be sent to post-arrival quarantine until all measures have been met.

Regarding the quarantine period, the 10 day period was selected as it will allow the engorgement and detection of the vast majority of ticks that may still be present. There are multiple species of ticks which have been identified as risk organisms, with highly varied life cycles. Feeding (engorgement) of soft ticks typically takes less than one hour, while for hard ticks “blood-feeding typically takes between 4 and 6 days after which they drop to the ground...” (Veterinary Parasitology, Taylor et al, Blackwell Publishing, 2007). Twenty-one days represents the long extreme of the range of feeding times. If quarantine was the only risk management measure for ticks a case for 21 days in quarantine could be made.

Measures will be reviewed in two years, and updated if indicated based on compliance. All non-compliances are recorded and reviewed, and measures can be updated sooner if necessary.

29.2 Import Permits: Again, why the change to the countries that currently do not require import permits? If the intention of these amendments is to reduce the workload on the available resources, this one counters that.

MAF comment: Import permits are required for all animals required to enter post-arrival quarantine. The import permit lists the transitional facility the animal will be directed to on arrival. The import health standard has been revised to incorporate the updated risk

management measures recommended in the 2009 *Import Risk Analysis: cats, dogs and canine semen*.

29.3 Biosecurity clearances from Australia: The requirement for this to be completed by a MAF vet is again affected by the available resources. It would possibly be appropriate for qualified, approved practicing vets to be appointed to do this on a contract basis, or at least be available if the current MAF inspection staff found a problem.

MAF comment: Verification Agency veterinarians are specifically trained in biosecurity measures. They are biosecurity inspectors and have a good understanding of live animal import/export certification and quarantine requirements. Private practice veterinarians could potentially be trained in biosecurity measures, however, there is a cost involved with managing, training, warranting, maintaining and assessing competencies for practicing veterinarians.

The inspection times are a way of consolidating the arrival times to maximise the efficient use of resources, and are based on historical data on the numbers of imported cats and dogs arriving at each port and the timing of specific flights. The inspection times will be reviewed regularly to ensure they are appropriate and Verification Agency veterinary resources will be allocated to meet demand. If there is adequate demand for animals to be cleared out of inspection times, the option for charging owners an additional fee for pre-arranged out of hours charging could be considered.

29.4 Acceptance times for flights from Australia: This is dramatically reducing the options for pet owners coming to New Zealand, & also the import of pedigree dogs & cats – in the case of Wellington, it halves the available flights (it reduces Brisbane to 2 available flights a week).

MAF comment: We acknowledge that the hours of arrival for veterinary inspection and border clearance for animals from Australia will reduce the number of flight options. Consolidating the arrival of cats and dogs will facilitate efficient and cost-effective biosecurity clearance. The hours have been scheduled to accommodate arrival of cats and dogs from all of the major ports in Australia to the three major ports in New Zealand. We appreciate the cooperation of pet exporters and the airlines to facilitate this change, and will consider all constructive feedback if schedules need to be adjusted.

29.5 The changes will have a marked effect on all centres, but in particular Wellington. MAF are already restricting the availability of their resources in the Wellington area & this is now taking it to the stage where it could be regarded as a restraint of trade. Animal exports & imports are not only a source of overseas funds, but they also help Wellington's freight handling figures to some extent. Also, there seems to have been no consideration given to the additional costs these changes will impose on pet owners.

MAF comment: This risk management measures are in no way intended to restrain trade. If the number of animals to be imported to New Zealand from Australia exceeds the air cargo capacity of the flights arriving during the scheduled time for veterinary inspection the schedule will be reviewed. Again, all feedback will be appreciated.

30. DOMONIQUE ROELOFSE, PRIVATE IMPORTER, SOUTH AFRICA

- 30.1 This is a submission of my support for the proposed changes to the tests for importing dogs and cats, and specifically the reduced Quarantine period.**

MAF comment: Noted

31. JAIME BERRY, JET PETS ANIMAL TRANSPORT, AUSTRALIA

- 31.1 Impact of Designated Arrival Times for Biosecurity Clearance Jetpets foresees that the amount of usable flights will be reduced by at least half by the implementation of these specified times for veterinary inspection and biosecurity clearance upon arrival into New Zealand. Some of these flight options are already limited from some Australian ports and to some New Zealand destinations. With the proposed changes, the demand for these limited flight options will increase, further reducing flight availability and options to pet owners and exporters. The Brisbane to Wellington sector, for example, only has 2 flights per week that arrive within the proposed designated arrival time. The impact this will have on airlines servicing New Zealand must also be assessed. Clearance hours will also create problems when unforeseen flight delays, offloads resulting from cargo capacity, mechanical problems and weather restrictions occur, limiting options for next flight availability to arrive within clearance hours. Couple this with the new veterinary requirements and a situation arises where veterinary protocols would become non-compliant, therefore requiring applications for equivalence, further expense and operational difficulties. Obviously any time in quarantine due to arrival outside of inspection times must be avoided. Consideration and provisions must be made to allow for biosecurity clearance options outside of these hours. Attention to the time difference between Australia and New Zealand coupled with the mandatory three hour cut of time the pets must be at the airport prior to the departure time must also be made before the Import Standard is finalised.**

MAF comment: The scheduled hours of arrival were determined based on flight arrivals from the major ports in Australia to the major ports in New Zealand, veterinary resourcing, and historic data on the number and port of arrival for animals from Australia. While this does limit the complete flexibility importers have enjoyed, it still allows the movement of animals. All constructive feedback will be appreciated if the number of animals cannot be accommodated, flights change, etc.

- 31.2 Australian Quarantine and Inspection Service: In general, Australian Quarantine and Inspection Service (AQIS) offices have regulated daily opening hours and set appointment times whereby they will issue export documentation. These factors therefore add to the considerations when arranging pet schedules to allow for compliance with veterinary protocols, laboratory scheduling, issuance of export documentation in line with compatible flights and airline cut off times.**

MAF comment: The timing requirement for the final inspection and certification has been changed to within 48 hours.

- 31.3 AQIS Approved Laboratory Limitations: Currently only one laboratory in Australia, Vetpath Laboratory Services in Perth, Western Australia, is accredited by the Australian Quarantine and Inspection Service to conduct testing for Babesia gibsoni. Testing for this disease is limited to two days per week (Monday and Thursday). Time differences between Perth and Eastern**

States coupled with these limited days for testing further reduce the flexibility surrounding the proposed timing for blood sampling for *B. gibsoni* to be able to coincide with other treatments within the protocol. The complications are further discussed in Section E.

MAF comment: The timing requirement for *B. gibsoni* has been lengthened from 10 to 16 days.

31.4 Final Pre-Export Veterinary Examination: Adjusting the final pre-export Veterinary examination to be within 24 hours of shipment creates further limitations with respect to veterinary and airline scheduling. Allowing the final pre-export veterinary health clearance to be conducted within 4 days, or at least within 48 hours of shipment, would increase flexibility and practicality within these areas. This extension would also allow for increased availability when considering concurrent AQIS appointment and laboratory testing timing. The current standard allows for Monday morning flights to New Zealand with the issue of AQIS documentation performed on the previous Friday. Obviously, with the suggested time frame, these options will no longer be available, further affecting flight options and increasing demand for those arriving within the designated clearance hours.

MAF comment: Multiple submissions expressed concern regarding the practicality of completing the final inspection and certification within 24 hours. The intention is to reduce the likelihood of a cat or dog carrying external parasites when imported and gain more timely assurance that the animal is clinically healthy closer to the actual time of shipment. In view of the number of submissions raising practical concerns with this change, it has been revised. The final inspection and certification must be completed within 48 hours of shipment. This reduces the time between final inspection and shipment from up to 4 days to within 2 days, while allowing more time for certification to be completed.

Documentation accompanying the cat or dog must include the original, certified Veterinary Certificate B. A copy of Veterinary Certificate A and laboratory results that are certified (all pages stamped and signed) by an official government veterinarian is acceptable.

31.5 Veterinary Treatment and Testing Schedule: Under the proposal, it is not practicable to perform all veterinary treatments in an efficient and timely manner, particularly when other components of the new standard along with AQIS, laboratory and airline factors discussed previously are taken into consideration. Also the distance of some clients from veterinary services should be kept in mind. The proposed changes increase the rigidity of the timing with respect to Babesia testing and endo/ecto parasite treatments in dogs, increasing the number of vet visits required, and therefore costs, and animal handling while reducing overall flexibility. Under the current import health standards (Section 22 of the Biosecurity Act 1993), Jetpets uses a formula to ensure that the necessary treatments are met while keeping the amount of vet visits, and therefore costs, for the owner and the pet to a minimum. This formula also maximises the efficient use of veterinary, Jetpets staff and other resources, thereby enhancing the logistical operation of moves to New Zealand.

Proposed Veterinary Adjustments: If the dual endo/ecto parasite treatments stand, the adjusted time frames below will allow for coordination of initial treatments with blood sampling (dogs) and second treatments in line with the final veterinary examination. This regime will also work in more effectively with laboratory and AQIS schedules. Heartworm testing: to remain within 30 days of shipment (will do at the time of blood sampling for Babesia) Babesia

gibsoni testing: sampling allowed within 20 days of shipment First parasite treatments: within 30 days (at the same time as blood sampling) and at least two weeks before the first Second parasite treatments at least 2 weeks after the first, within 4 days of shipment (at health check time) Final pre-export examination preferably to remain to be within 4 days, if not then within 48 hours.

MAF comment: We appreciate the time and cost of importing animals to meet the biosecurity requirements. However, each risk management measure has been based on the risk analysis, and these measures are required to manage the risk of introducing the identified exotic diseases and pests while still allowing the import of cats and dogs. We have tried to balance the risk management options and practical considerations.

31.6 Greyhound Industry: Jetpets services many clients within the greyhound industry in both Australia and New Zealand. Due to the nature of the industry, training regimes, distance from accredited vets and other factors, the minimal time frame required to comply with the veterinary standards is always preferable. Among other things, this reduces handling, costs and transport to and from premises and allows for further convenience for greyhound clients. In conjunction with the impact of clearance arrival times, the implementation of the proposed veterinary changes will greatly disrupt the mechanics of this component for Jetpets' greyhound clientele. Further analysis into the effects on the greyhound industry (Australian and New Zealand) is advised.

MAF comment: Greyhound Racing New Zealand has been consulted and made a submission (see submission from Keith Coppins).

31.7 Microchipping: Jetpets agrees that microchips are advisable to ensure accurate pet identification with the corresponding Microchip number listed on all corresponding documentation. Acceptance of older style 10 digit trovan, destron or fecava microchips would also be advised (if compatible) to prevent unnecessarily Microchipping pets with existing microchips.

MAF comment: All microchips meeting the ISO specifications in the guidance documents will be acceptable (11784:2001 and 11785:2001).

31.8 Residency Equivalence: Should the status of owner/s change upon arrival into Australia, there may be a requirement from time to time to allow scope for dispensation should animals require transportation to New Zealand within 6 months after release from Australian Quarantine.

MAF comment: Noted.

31.9 Provision of Original Documentation: In many cases, time and distance factors lead to different veterinarians performing the initial and final veterinary treatments and associated paperwork. Subsequently, faxed copies are sometimes the only available documents. Also, laboratory results for canine Babesia and Heartworm testing are received via facsimile or email due to the short time frame between the laboratory testing date and the date of export. Both factors and the occasional last minute change required, for example due to a typographical or omission error by the submitting veterinarian, can sometimes lead to copies of veterinary treatments and tests being the only forms available in a timely manner to enable AQIS authorisation prior to the scheduled time of export. Jetpets suggests that copies of any initial veterinary treatments and laboratory tests be allowed provided they are certified by AQIS

and accompanied by original final veterinary certificates and AQIS documentation.

MAF comment: This meets the certification requirements in the Import Health Standard (see Section 16, Documentation). Documentation accompanying the cat or dog must include the original, certified Veterinary Certificate B. A copy of Veterinary Certificate A and laboratory results that are certified (all pages stamped and signed) by an official government veterinarian is acceptable.

31.10 Jetpets also requests clarification on the proposed sample zoosanitary certificate and whether the Owner/Exporter Statutory Declaration with respect to prohibited breeds of dog and the Owner/Exporter Declaration regarding age and pregnancy status of the animals will be replaced by the contents of the Model Veterinary Certificate A for Cats and Dogs from Australia.

MAF comment: Owner breed declaration will still be required, per New Zealand Customs. This form will be added into the Guidance Document and must be completed pre-export and added to the veterinary documentation.

31.11 72 Hour Notification: Jetpets Animal Transport requests clarification on whether the notification 72 hours prior to arrival is to be performed by the airline, the owner or exporter and the method of notification that should be used.

MAF comment: See responses to 27.7 and 27.8. Details for advance notification are in the guidance document.

31.12 Transition Period Recommended: Upon implementation of any changes to the Import Health Standard, Jetpets recommends a transition period to ensure compliance with the amended standard is achieved. An additional provision of lenience for a period following introduction will enable any issues that arise to be assessed and worked through collectively before any quarantine and / or other penalties are imposed. This will also allow the review of the practical aspects associated with the changes to ensure they are working for all involved.

MAF comment:: We appreciate that the changes will require an increased effort on everyone's part. The review of submissions and final version of the import health standard, guidance document, and risk management proposal will be sent to all stakeholders before the new import health standard is issued, along with the anticipated date that the new standard will be issued and the new requirements take effect.

32. ALAN EMERSON, JP, NEW ZEALAND

32.1 I'm sure, like you, I'm committed to seeing New Zealand's borders secure from unwanted and undesirable pests and organisms. I can also understand the desire to have standard rules and regulations. In this case, however, I believe that Hawaii can fulfil that standard by being given the same status as Australia. Hawaii, like Australia doesn't have exotic ticks and the brown tick can be treated the same way from Hawaii as from Australia. As a non-veterinarian I cannot see any issue that Hawaii has that is any different from Australia. I could further suggest that the size of Hawaii would encourage a far better animal health regime than that of Australia. Further from a farming perspective we have considerable investment locally from Hawaii. Those investing are good local citizens, responsible people and sustainable farmers. Because of Hawaii's relative closeness, (closer than parts of Australia), they come over regularly for short periods of time. The proposed standard would mean that they would be unable to bring their dogs which would ensure unreasonable hardship and encourage inefficient farming practices. Finally there is a system in place in the form of Qualified Pet which has been used successfully for seven years and is capable of continuing to do so. Finally, as I've already stated, I am committed to strong and robust border security. Giving Hawaii dog importation the same status as Australia would compromise that.

MAF comment: Noted. Please see response to submission 11.

33. KEITH COPPINS, GREYHOUND RACING NEW ZEALAND

33.1 Greyhound Racing New Zealand (GRNZ) is the authorising body for the Greyhound Racing industry in New Zealand. Each year around 600-700 Greyhounds are imported into New Zealand from Australia.

The main risks associated with the importation of Greyhounds is External Parasites and in particular Fleas and Lice. For fleas GRNZ would opt for option 2 (i.e. "Treatment as in option 1 and inspection, with certification that the animal is free from fleas within 3 days of travel") and for lice option 2 (i.e. "Veterinary certification that the animal has undergone pre-export treatment with an effective insecticide within 3 days of travel, and been inspected and found to be free of lice").

MAF comment: As there have been a small number of cats and dogs, including greyhounds, imported with fleas and ticks, the measures for external parasites have been increased. We appreciate that this imposes additional costs and time requirements on your industry, and will be closely monitoring the effectiveness of the new measures. A summary of related requirements include:

- Two pre-export treatments (rather than one) must be applied to the animals at a specific interval. This should help reduce parasites in the home environment, reduce the risk of the animal being infected with a disease carried by ticks shortly before arrival, and allow time for the treatment to reach full effect.
- These treatments must be done by a veterinarian. This increases assurance that the treatments were done at the correct times and that they were applied according to manufacturer's recommendations.

- Treatment will not be restricted to one specific product, as it is in some of the current Import Health Standards. This has been changed, as products may lose their effectiveness over time. The requirement allows use of one or more products registered in the country of export and recommended by the veterinarian for tick control.
- The veterinarian must certify that the animal was inspected and found to be free of ticks and fleas at both visits. If the animal is found to have ticks or fleas the treatment series must be repeated.
- The final inspection must be done within 48 hours of shipment (previously within 96 hours).
- The post-arrival inspection in New Zealand will be done by an official government veterinarian. Although Inspectors are trained and skilled at parasite inspections, veterinarians have more training examining animals and recognising problems.
- All dogs and cats, except those from Australia, will be directed to post-arrival quarantine for a minimum of ten days, or until they have complied with all requirements. This will result in a much larger percentage of imported cats and dogs going into quarantine, as previously only cats and dogs from countries with rabies measures were sent to quarantine. Any cat or dog from Australia found to have ticks or fleas on post-arrival veterinary inspection will immediately be sent to a quarantine facility.

33.2 With regards to the other possible risks GRNZ believe that these will be adequately covered by whichever option is chosen.

MAF comment: Noted

33.3 Arrival Times for Biosecurity Clearance for Cats and Dogs from Australia: One of GRNZs stakeholders and a major importer of Greyhounds from Australia has asked whether or not the arrival times can be adjusted. This is due to the timing of the majority of flights that Greyhounds tend to travel on, for example one regular flight lands in Auckland at 1730 hours and therefore with the allowance of 2 hours for inspection an 1830 hours cut off could have ramifications. Is it possible to adjust as follows:

**Auckland
0530 to 1930 hours**

**Christchurch
1200 to 1830 hours**

**Wellington
1330 to 1700 hours**

MAF comment:: As long as the dog **arrives** during these hours, the Verification Agency veterinarian and Inspector will inspect the dog at the border. For example, if the dog arrives in Christchurch at 1730 on a weekday and advance notification was given, the veterinarian will stay at the port until inspection of all cats and dogs arriving within the specified hours is completed. Hours may be adjusted if necessary, and all constructive feedback will be appreciated.

34. ROBYN VAN DEN BRINK, PETHAVEN SERVICES, NEW ZEALAND

34.1 Post-arrival quarantine: All non-compliant animals from Australia, and those arriving outside of the hours scheduled for veterinary inspection, will be sent to an approved transitional facility and remain there until all non-compliances are resolved and/or until biosecurity clearance is given. I want to know how

this will be supervised in the Auckland section as there are 3 Transitional facilities available to accept dogs and cats non compliant or after hours.

MAF comment: Importers or their agents are notified if an animal is non-compliant. The owner or agent is responsible for making arrangements directly with a transitional facility.

34.2 I would like to know what procedures are we to follow should a pet be due for release on a public holiday. Bearing in mind that in 2010 the following: Christmas Day, Boxing Day + 2 extra days and New Years day + 3 extra days?

MAF comment: Compliant cats and dogs must complete the minimum 10 day quarantine period and can then be released on the next working day a Verification Agency veterinarian is available. Importers should plan accordingly regarding statutory holidays to avoid any additional time in quarantine.

34.3 Will the historic “Inspection by NZFSA vets within 72 hours of arrival or release” be maintained for all pets requiring the 10 day quarantine period?

MAF comment: Yes

34.4 I cannot dispute the Veterinary or Scientific aspects of the Review although I would be advising that ALL pets that are now listed in the Approved Countries for Dogs and Cats be required to spend 10 WORKING DAYS in quarantine before release.

Dogs and cats from Australia should also be required to spend 72 hours in quarantine and if fully compliant, be released.

Human error and cost recovery are my biggest concerns with the adoption of the new Standard and only time will tell if the foundation is secure.

MAF comment: Noted, see response 1.1.

35. BRIAN FALKINGHAM, MERMALADE BRIARDS, NEW ZEALAND

35.1 The introduction of limited hours at Christchurch appears to be for the benefit of the staff not that of the animal or the customers and therefore is not a valid reason to introduce such a restriction, having imported through Christchurch in the past it is extremely difficult to hit the already limited operating window on long distance flights, reducing it as suggested will effectively mean all imports are held in the quarantine kennel.

MAF comment: These hours were determined after consideration of flight schedules from the major ports in Australia to the major ports in New Zealand, Verification Agency veterinary resources, historical data on the number, port, and time of arrival of cats and dogs, and consultation with MAF Quarantine Inspectors in Auckland, Christchurch, and Wellington. Schedules will be adjusted if necessary, and all constructive feedback will be appreciated.

35.2 Secondly I do not agree with the 10 day quarantine from countries that currently have a zero quarantine period, no evidence appears to be present to suggest this will benefit anyone except the quarantine kennels and again it does not help the animal. By all means reduce the quarantine period from other areas where the current quarantine is more than 10 days but I did not see any justification for this either so wonder where the idea came from, it does rather sound as if we have no evidence that the current quarantine is

servicing an effective purpose but we are introducing a 10 day quarantine just in case. Is this change for change's sake?

MAF comment: The biosecurity clearance scenarios considered ranged from clearance of all compliant cats and dogs at the border to post-arrival quarantine for all imported cats and dogs. It was agreed that it is a high priority to have official veterinarians undertake all physical inspections. This is a significant shift from current practice, where cats and dogs that do not require post-arrival quarantine are cleared at the border by inspectors, and animals in quarantine are cleared by official veterinarians.

Post-arrival quarantine requirements were previously based on rabies risk mitigation, although they also provided a “safety net” for other risks. The risk mitigation measures for rabies no longer include quarantine, however, the value of post-arrival quarantine was considered to allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engagement of any ticks still present, a thorough documentation check, and confirmation of clinical health.

The final recommendation that cats and dogs arriving from all countries except Australia be sent to post-arrival quarantine for a minimum of 10 days was made after extensive review of the risk management options, veterinary resourcing, statistics of animal arrivals, and current government-to-government agreements.

Cats and dogs from Australia have fewer risk mitigation measures and therefore fewer documentation requirements due to Australia’s health status. The documentation check and physical inspection for cats and dogs from Australia will be conducted at the border. Any animal that is not compliant with the requirements, or is found to have fleas or ticks; will be sent to post-arrival quarantine. Fractious cats or dogs, and those arriving outside of the scheduled time for veterinary inspections, will be sent to post-arrival quarantine until all measures have been met.

Measures will be reviewed in two years, and updated if indicated based on compliance. All non-compliances are recorded and reviewed, and measures can be updated sooner if necessary.

35.3 I suggest that rather than 10 day quarantine in quarantine kennels to detect ticks a house arrest with compulsory vet checks every 5 days for say 3 weeks would be easier on the animal and owners and reduce the work of the quarantine staff at the point of entry whom appear to be so over worked they can not attend to animal arrivals for more than a few hours per day.

MAF comment: Home quarantine is only allowed for qualified assistance animals, as compliance and conditions would be highly variable and difficult to control.

36. ROBYN MARTIN, BIOSECURITY AUSTRALIA

36.1 New Zealand proposes that all dogs and cats entering New Zealand, other than from Australia, will require a post-arrival quarantine period (PAQ) of 10 days, and that PAQ is no longer included as a risk management for rabies. Australia is currently undertaking a review of rabies in relation to dog and cat imports, which will consider the length of post-arrival quarantine including that required to minimise the introduction of contagious exotic diseases and external parasites. The review will also consider dogs and cats that have been

imported into New Zealand and period of residency in New Zealand before export to Australia.

MAF comment: Noted.

- 36.2 New Zealand proposes removal of the requirement for testing dogs for *Ehrlichia canis* prior to Importation into New Zealand. In accordance with Australia’s current requirements, dogs imported into New Zealand will require testing for *Ehrlichia canis* before export to Australia. Mechanisms will need to be in place to ensure that all dogs imported into New Zealand are identified and can be recognised as previously imported before export to Australia.**

MAF comment: The Export Certificate-Cats and Dogs Exported from New Zealand to Australia must be signed by a MAF-approved veterinarian. This includes certification of the following: “I am satisfied by veterinary or council registration records that the dog has been continuously resident in New Zealand since birth, or since it was imported from Australia,” or the dog was tested for *Ehrlichia canis* (and *Leishmania infantum*).

- 36.3 We request confirmation that New Zealand has approved the PCR test for *Babesia Gibsoni* developed by Dr. Peter Irwin at Murdoch University, for dogs being exported from Australia to New Zealand.**

MAF comment: We are currently seeking information regarding validation of this test.

- 36.4 Australia makes the following general comment:
Prohibited breeds
Australia has added the *Presa canario* breed to the list of prohibited imports.**

MAF comment: Legislation has been pending to add the *Presa canario* to the list of dog breeds prohibited in New Zealand. If and when this becomes law, this breed will be added to list of prohibited breeds in the Guidance Document.

- 36.5 Model Veterinary Certificate A for cats and dogs from Australia**
- ***Heartworm treatment for dogs***
Australia suggests that the treatment options ‘a.’, ‘b.’ and ‘c.’ on page 4 are listed as alternatives to option ‘d.’, consistent with the heartworm treatment options on page 10 or page 16.

MAF comment: The heartworm treatment options have been clarified.

- 36.6 *Examination within 24 hours of export***
The examination by a registered veterinarian and certification by the Official Veterinarian within 24 hours of export may be operationally difficult. Australia requests that the final pre-export check be within 48 hours before export.

MAF comment: Final examination has been changed to “within 48 hours” as requested.

- 36.7 Model Veterinary Certificate B for cats and dogs from Australia**

Australia requests the wording for certification re absence of *L. interrogans* serovar *canicola* be changes to:
“To my knowledge, in the 12 months prior to export there have been no cases of the following diseases ~~diagnosed~~ reported in Australia:
b. Canine Leptospirosis caused by *Leptospira interrogans* serovar *canicola*”

MAF comment: The wording has been modified as requested.

37.8 Model Veterinary Certificate B for cats and dogs from countries or territories recognised as rabies free

Declaration of rabies freedom

A declaration of country freedom from rabies is not included. For consistency with the declaration required for dogs imported from Australia, Australia suggests a declaration of rabies freedom be included in the Veterinary Certificate B.

MAF comment: Declaration of rabies freedom has been added to the Model Veterinary Certification for Countries Recognised as Rabies-Free

36.9 Testing for *Babesia canis* for dogs from South Africa

New Zealand will require treatment or testing of dogs for *B. canis* before importation. Australia currently requires any dog that has ever been resident in Africa to be treated for *B. canis rossi* with imidocarb dipropionate before importation into Australia. This could result in a dog tested with a negative result before entry into New Zealand requiring treatment with imidocarb dipropionate before subsequent export to Australia. Australia is currently reviewing import conditions for piroplasmiasis and will consider the option of testing for *B. canis rossi* as an alternative risk management measure to treatment.

MAF comment: Noted.

36.10 The requirement for testing or treatments of dogs for *B. canis* appears to apply only to dogs from South Africa, specified in the *Model Veterinary Certificate A for cats and dogs from specified countries where rabies is absent or well controlled*.

Could New Zealand please clarify whether the requirement for testing or treatment of dogs before export for *Babesia canis* refers only to *B. canis rossi* or does this requirement apply only to dogs exported directly from South Africa; or does it include dogs imported from South Africa into a third country and subsequently exported to New Zealand?

MAF comment: The testing or treatment requirement for *Babesia canis* is only required for dogs potentially exposed to *B. canis rossi*, as New Zealand does not have the vectors for other *B. canis* subspecies. The requirement has been modified to include “Dogs that have ever resided in or travelled to South Africa.” This measure has been copied into the Model Certification for Countries and Territories Recognised as Rabies-Free to help ensure that all imported dogs that have spent any time in South Africa will be treated or tested prior to import to New Zealand.

APPENDIX ONE: COPIES OF SUBMISSIONS

1. Dear Ms Richmond,

We have just seen the proposed changes to import health standards for dogs & cats travelling to NZ, our particular interest will be from the UK.

Would it be possible to understand the reasoning behind the potential new requirement for 10 days quarantine for dogs & cats coming directly from the UK? As New Zealand has not had a quarantine period before for pets from the UK, we will need to be able to give some reasons for the change to our clients who will, understandably, be quite opposed to the idea. In fact, I'm sure that many UK clients would far rather Rabies vaccinate their pets and Rabies blood test them before export to NZ, if this was a way to remove the need for quarantine. Although only 10 days is proposed, clients are incredibly "anti" quarantine and will conform to any additional requirements in order to try & remove the need to have their pets away from them for any length of time.

Is there any kind of compromise or alternative to quarantine that can be suggested? Further blood testing is always possible before departure for any conditions that Biosecurity have issue with

The need for an import permit is completely understandable to track incoming pets. In fact when this requirement was dropped several years ago, we thought it would be brought back in far sooner

If the changes are adopted, will there be a period where old & new systems are still acceptable, or will there be a date set well in advance where the change will happen? Any advice you may have on possible dates of change would be very much appreciated

I look forward to hearing from you

Kind Regards

Catherine Allaway VN Senior Pet Travel Consultant, Pet Air UK Ltd

2. Dear Charlotte Richmond,

Many thanks for your e-mail and seeking for advice and comments from stakeholder all over the world.

First of all we would like to thank you for considering the import regulation and especially shorten the quarantine stay for dogs and cats.

We would like to include our comments and concerns for the changes as below. At first we would like to repeat the main changes that concern dogs & cats from countries where rabies is absent or well controlled (in our case: Switzerland) to assure we understand it correctly. Please correct us if we understood something wrong:

| REQUIREMENT | NEW | OLD |
|--------------------|--|---|
| Quarantine | 10 days upon arrival | 30 days upon arrival |
| Titre test | Between 3 – 24 months prior to exportation | Between 5 – 12 months prior to exportation |
| Faecal collection | NOT required | Twice within 30 days at least 14 days apart |
| External treatment | Within 30 days at least 14 days apart | Within 4 days |

| | | |
|------------------------|-----------------|----------------|
| Brucella canis testing | Within 14 days | Within 30 days |
| Babesia gibsoni | Within 14 days | Within 10 days |
| Examination | Within 24 hours | Within 4 days |

The main concern we have with the above changes is that the examination now needs to be within 24 hours prior to departure. We always asked our clients to visit the official veterinarian at least 2 days prior and then immediately send us copies of the health certificate. We started doing this because a lot of official veterinarians make mistakes on the forms and we have to send clients back to the veterinarian to correct the paperwork. With the new restriction of this being within 24 hours makes this procedure difficult and will delay many shipments due to the short time frame – and therefore some of the test dates and treatments may also fall out of the time frame.

Solution:

Instead of having the official veterinarian having to stamp and sign the certificate within 24 hours, the border vet (that fills out the last page and provides the seals) can finalize the paperwork within 24 hours. This would be leaving the part for the official veterinarian within 4 days, which will help avoiding lots of problems on the exporting end (and therefore also for the arrival as less shipments would need to be re-booked).

We are available for any questions or clarifications needed from our point of view. We hope that the above information and comments help and look forward to receive your feedback.

Best regards

Marcel Brozius, Ace Pet Moving GMBH, Switzerland

3. Hi Charlotte

I have read through all of the documents, and notice that a significant change arriving from the UK would be 'Post Arrival Quarantine for a minimum of 10 days for cats and dogs'.

Are these facilities to be built or is it envisaged that cats and dogs would have this at Auckland, before onward travel to say Dunedin or Nelson? Also, could you possibly let me have an idea of quarantine costs, as many of our customers are starting to plan their exports throughout 2011 into 2012 and beyond?

Thanking you in anticipation.

Regards

Paul Jeffery, Transfur Animals - Pet Relocation Specialists, UK

4. Hi charlotte,

its great that you ask for the feedback of the specialists prior implementing new rules.....wow - I think there is no ministry in good old Europe doing that, they always set up new rules and only than they begin to discuss!

We in Austria are fine with the new rules; we also have no problem with the health cert which must be now within 24hrs prior departure as we have the government vet at the airport anyway as he seals the box and signs the permit right before departure.

I am not sure but most government vets in Europe should be also licensed to issue the health certificate, no matter if it's a part of the permit (=special form) or the one used in the country of origin /bilingual incl. English is a must.

One question - are similar rules also in discussion for import to OZ? As far as I know there is free movement in between NZ and OZ so if OZ doesn't change there will some clients maybe use NZ with the new rules and than re-export to OZ??

Have a great day and regards from Vienna, Helmut, Animals First Bogner OG

5. Hello Charlotte,

Yes it is! All of the changes would be welcome, except for the final inspection within 24 hours of departure. As Calgary is located 1.5 hours by plane to our gateway in Vancouver, there is not enough time in one day for the pet's attending veterinarian to do the final clinical exam, get the completed documentation to the Calgary CFIA animal health office for endorsement, get the pet checked in for a flight to Vancouver, get the seal for the travel kennel from the Vancouver CFIA animal health office and give the pet a comfort stop before the long haul journey. We must have our local CFIA animal health office sign off on the Zoosanitary Certificate and then the Vancouver CFIA animal health office assigns the seal. We also export pets from cities even further inland in Saskatchewan and there are just not enough hours in one day to meet all of the requirements. Add to that, that sometimes the only available direct flight from Vancouver to Auckland departs on a Sunday. That would make it impossible for the CFIA animal health offices to sign off on the Zoosanitary Certificate in Calgary, and assign the seal in Vancouver. Absolutely impossible.

As the protocol stands now, it is very difficult to coordinate all of timing for the blood tests which must be conducted in the States as Canada does not have any approved labs. As I'm sure you are aware, we have had to postpone and rebook pet shipments because we have not been able to get the 30 day rabies titre test and the 10 day Babesia tests back in time.

I thank you for your time and interest in this matter.
Karen Shiel, Boomerang Pet Carrier, Canada

6. Hi Charlotte,

Thank you for the opportunity to have a few things clarified and to comment on the new proposed health standard. We are ecstatic that South Africa's status has finally changed. This will also allow clients to go to Australia via New Zealand unless AQIS changes there current health standard.

1] Please clarify why the cat or dog has to be nine months of age or older at date of shipment. I know this corresponds with the primary rabies vaccine Not being less than 6 months prior to shipment. As most cats and dogs have their first Rabies vaccine at 3 months of age, waiting an additional 1 month for the anti-bodies then doing the Rabies Titre Test, this is then 4 months of age then the 3 months min. period waiting before departure takes one to 7 months of age and not 9 months. Please advise why it was decided on this time frame.

2] The examination within 24 hours prior to departure is going to put an immense strain on not only pet shipping companies but on a private individual. This means the day before the flight the examination will have to take place very early. Then the paperwork will have to go through to state vet for certification and in South Africa most stat vets don't certify after 12:00. This leaves no room to correct any problems that may arise. Would it be possible if it could not be looked into if we could revert back to the 4 days prior to departure examination?

Kind regards,
Danuta Havemann, Keringa-Petwings, South Africa

.....

If a pet has had a Rabies vaccine on 13 December 2010 and there are no other Rabies vaccines prior to this one then this pet can only leave SA for NZ 6 months from this vaccine.

This pet had a Rabies test done on the 03/01/2011. Is there a waiting period from the Rabies Vaccine until the test is done? In this case 3 weeks is this ok for the new import conditions?

Another thing I am unclear on is if a pet has been regularly vaccinated over the years but then only gets a microchip before the last set of vaccines is this current vaccine then considered as the primary and the others ignored or does the entire vaccination history get taken into account.

E.G. Rabies vaccine every January from 2005, but the chip was only inserted with the January 2011 vaccine would the January 2011 vaccine be the primary and the pet has to wait 6 months before leaving?

Sorry I need to know the finer details

Kind regards,
Danuta Havemann, Keringa-Petwings, South Africa

7. Hi Charlotte,

I have been working my way through all the documents regarding the IHS for Cats and Dogs with a view to making a submission and have also spoken with John Clark of Shado-Lans Quarantine Kennels, which gave me another perspective than actual importers.

Apparently in August 2010 the original idea was to do away with quarantine stay altogether but the Clarks are claiming credit for wanting some retention, the rationale by them and MAFBNZ seems to be based mainly on Ticks. Yet you expressly exclude Australia from any Quarantine or Import Permit. This is the very country most likely to be an entry source and has one of the most toxic ticks in the world, with the ability to hospitalize and even kill humans!!! Coming from Queensland/Far Northern NSW we know from experiences of both personal friends and local newspaper reports, as well as with dogs, in spite of all precautions. Our vet used to say that three way treatment was needed, topical (once a month), oral (alternate days) and daily searching. East coast Australian veterinary hospitals/clinics as well as the research of the University of Queensland also recommends this.

I would therefore like to make the following suggestions -

1) that the August idea of doing away with quarantine stays be reinstated for least risk countries, with the use of Frontline Plus (topical) and Proban tablets (oral) WITHIN 2 DAYS OF DEPARTURE, plus the other tests currently used for different things..

4 days is too long a time not to pick up a tick. Proban is an oral medication for control of ticks, fleas and demodectic mange in dogs and for control of (officially) fleas in cats (see note below after manufacturer's details). It is frequently used in combination with Frontline for additional tick prevention in high risk areas. It is also used anally by vets on presentation with a tick affected animal.

Frontline & Frontline Plus: this product was tested specifically against four tick species: the deer tick, the lone star tick, the American dog tick, and the brown dog tick. I was also told this personally by the manufacturer's Australian representatives after contacting them because of the breakdown on two occasions. It has apparently not been tested against the Australian ticks nor the European ticks!

NB Frontline Plus is the preferred recommendation by Australian vets

Proban

Manufacturer: Boehringer Ingelheim Pty Limited

Registered Name Proban Systemic Insecticide

Composition Cythioate 30 mg.

Actions Systemic insecticide.

Indications Fleas on dogs and cats, demodectic mange and ticks on dogs.

Contraindications Administration to sick, pregnant and lactating animals or those recovering from surgery or receiving another organophosphate. (*** NB at risk Australian breeders continued to dose as the lesser of two evils; personally I never experienced a problem)

Precautions Safety directions Avoid contact with food or food utensils. Avoid contact with the skin.

First Aid if poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 131 126.

Dosage and Administration Dogs. Flea control, demodectic mange. 1 tablet/10 kg bodyweight twice a week. As fleas thrive and breed most rapidly in a warm environment, treatment should be commenced as the temperature starts to get warmer, and be continued until the cooler weather. Treat the animal's environment (inside and outside) with an appropriate insecticide.

Paralysis/scrub tick (*Ixodes holocyclus*). 1 tablet/10 kg bodyweight on alternate days.

Continue treatment through tick season. Daily searching for and removal of ticks from dogs is recommended.

Cats. Flea control. ¼ tablet/5 kg bodyweight in mouth twice a week.) Please note that while this product is registered for use in cats for fleas, the manufacturer makes no claims as to its effectiveness against ticks. However, Australian veterinary experience suggests it works very well against ticks. However, it is very important that you do not combine Proban with another organophosphate, (nor to overdose cats).

2) That the rabies-free countries currently needing no Import Permit retain this status.

To give Australia special privileges because of Trade Relations (ha!) is totally hypocritical. Either include them or give the previously exempt countries their status back.

I think some European countries might have more of a tick population than others - I have never experienced a tick in all my stays in Sweden or Norway, forests or grass; I have however had one in a German wood and know of two other instances of German ticks..

Proposed MAF Inspection times

Wellington

1330 to 1630 hours (weekdays only)

My most recent import from Sweden gave me horrendous problems from beginning November 2009 to 1st April 2010 - the only thing that did not seem to impact was the Icelandic volcano chaos! There were a number of factors involved; including the non-transfer from a BA flight to Qantas in Singapore, so that when she arrived in Sydney one airline did not know what to do with the unexpected arrival (quarantine) and the other was running around trying to find out where the dog was! This involved Sydney, Singapore, Heathrow, Wellington and Auckland. The result was the first flight she could be put on was scheduled to arrive in WLG at midnight, but was late. We got home to Levin at 3.30am. My point is that unexpected things can and do happen and the loss of the midnight flight option (which most of my dogs seem to have come in on) seems unfair to people in the lower North Island. Another point - livestock is the first thing to be dropped off the cargo list in cases of adversity.

Sincerely,

Thelma Morrell, Farfalla Papillons & Phalenes, New Zealand

8. Dear Wendy,

Very many thanks for your fax, dated 4th February 2011 – Ref: AI-00-9L – and please let me explain why we would like to see Streptomycin back on the menu.

We have always first tested a dog for Lepto – if the result was positive, we have not done a second test. In the case it should be a rising titre and therefore advised our clients to use either of the antibiotic options.

However, we have a little dog, Jade, travelling at present to New Zealand and who is just over four months old.

For her own protection she was vaccinated with the normal Canine vaccinations – including Lepto – and as expected when blood samples on Tuesday, 11th January 2011, the test result was positive at 1/100.

It was decided by all, because we are dealing with a puppy that if at all possible the antibiotic options should be avoided and a second sample, taken 25th January 2011, was submitted for testing. For once we jumped the right way and this result being the same as the first one, means Jade is travelling without using antibiotics.

However, had the result been rising we would still had time to use dihydrostreptomycin, but not doxycycline and which in any case we feel is not suitable for a puppy.

I hope that Jade’s case history might illustrate why we feel there is a case to leave the Strepto option on the Menu.

I do thank you for adding this as a submission.

Best wishes,
Mr Chris Sorenson

.....
8.1 Dear Miss Newsham

Ref. Draft IHS for Cats and Dogs

From the information received, I gather “post arrival quarantine of a minimum of 10 days will be required for cats and dogs from all countries, except Australia. This will allow external parasite inspection and detection, a thorough documentation check and verification of clinical health.”

I appreciate that there is more information to check from the U.K than from Australia also I am the first to accept that a long-haul flight from the U.K has additional risk to a flight from Sydney, but those risks on the other hand may be better monitored under the watchful eye of the owner than in a quarantine establishment.

External parasite? Yes, we certainly have them. They may not be visible today, but tomorrow they may. I have no idea how many cases of Babesia Canis the V.L.A has come across – we ourselves do recall that Australia did have Babesia and I am therefore surprised that Australian pets are not being subjected to 10 days post-arrival quarantine as ours are. Seems a little strange.

Yours sincerely
Chris Sorenson

9. Thank you for your email with the enclosed 'import health standard' attachment. I submit that the change in quarantine time from 30 days to 10 days is sensible and preferable. Ten days is a reasonable amount of time for animals to be observed for any external parasites and symptoms of infectious disease to show up. Our dog Hoki is coming to Europe with us and returning when we do. We intend to be in Europe for up to one year. Our commitment is to keep him in the same pristine health condition he is currently in and to continue the same when we are overseas. We are taking Hoki with us because we are his family and we are responsible for him. I feel that the distress to my husband, myself and Hoki on our return to New Zealand, to being quarantined for any length of time will be high regardless of the amount of time he spends in quarantine, however the lesser time of 10 days is preferable. I am grateful that MAF has the wisdom to consider reducing the quarantine period at this time.

In gratitude,
Alexis Mitchell, Private Importer, New Zealand

10. Dear Charlotte,

We received below email from Marcel about the new, New Zealand import requirements. He asked for our comments in this matter so herewith I send you ours;

"24hours shouldn't be a big problem as most vets want to help their clients with changing the time of examination a bit but 2 days would be better as the Gov vet is not that tolerant here in Holland, Amsterdam. We would really like it if it can stay by 4 days, but if you need to change it, 3 or 2 days in advance is better, not 24 hours. I think we all, always arrange the crate seal and cert B within 24hours as we do that half an hour before we deliver the pets to the airline.

I totally agree with Marcel that the other changes are great, especially the shorter quarantine period.

Should you need more comments please do not hesitate to contact us.

Best Regards,
Linda Broekhof, Live Animal Logistics, The Netherlands

11. Dear Ms Richmond,
In an effort to be complete, I responded to Mr McGuire's email and have forwarded the formal request in a separate email to you.

I realize that there is concern about more than just external parasites on dogs.

The stringent screening that is required by NZ and which my vet and I have always adhered to would have protect my Jack Russell's from travelling to NZ with any of the following:

Cats and dogs

- a. External parasites
- b. Internal parasites
- c. Rabies

Dogs only

- d. Babesia canis
- e. Babesia gibsoni
- f. Brucella canis
- g. Canine Transmissible Venereal Tumour
- h. Filariasis (Canine Heartworm, Dirofilaria immitis)
- i. Leptospirosis (Leptospira interrogans, serovar canicola)

Please review the content of my request and let me know that you have received it and will place it before whatever decision making body is appropriate so that I may continue to bring my dogs to NZ without the undo hardship of 30-40 days quarantine yearly.

Any comments or additional input you might care to offer us would be most welcome.

Sincerely,

Lee Guertler and Della Lin, Private Importers, Hawaii

.....
11.1 Dear Mr McGuire:

I am the owner of 5 Jack Russell terriers that have short white hair and are experienced travellers as I bring them to NZ from Hawaii on holiday 3-4 times yearly. We own a several thousand acre property near Masterton and the dogs have been travelling without incident for over 7 years. They are used to being handled and examined by MAF staff on arrival in Auckland and I use the services of Qualified Pet Service to assist in their transition and paperwork.

I have reviewed the proposed changes to the animal import requirements from Hawaii in light of the issues related to preventing and detecting ectoparasites and would like to submit the following modification specifically as it relates to dogs which have been treated twice with a designated topical agent to kill fleas and ticks and then examined by a Hawaii Vet and certified flea/tick free.

Proposal

1. The cat or dog was treated by a veterinarian TWICE with a topical product registered for the control of ticks and fleas at the manufacturer's recommended dose and certified as free from external parasites at each treatment. The first treatment was given within 30 days of shipment and at least 2 weeks before the second treatment, and the second treatment was given within 4 days of shipment;

AND

Risk Management Proposal: Cats and Dogs CATDOG.GEN 18 January 2011 21

2. The cat or dog was inspected and certified as free of external parasites within 24 hours prior to shipment;

AND

3. The cat or dog was inspected and found to be free of external parasites post-arrival, prior to receiving biosecurity clearance.
I would hope that after fulfilling all three of these criteria (which my dogs always have done) I would then not have to submit them to further 10 day quarantine in NZ to see if engorged ticks appeared.
As you can see from the frequency of my visits this would be an unreasonable hardship and result in me having to quarantine the dogs 30-40 days each year.

We have no exotic ticks in Hawaii I am reliably informed both my vet in Honolulu Dr Lisa Kam who is the past president of the Hawaii Vet Society and the United States Federal vet Dr Falls

. The COMMON BROWN DOG TICK is the only tick in the island and can reliably be 100% killed by a double application of topical agents. Furthermore, the strict quarantine Hawaii has in place will help insure the safety of both NZ and Hawaii from exotic pests and diseases.

Please consider this a formal request to place dogs from Hawaii in the same NON QUARANTINE category as Australia.

If you would respond to this email so I can be sure it has been received, is in the correct form, and will be submitted as a formal request to alter the proposed Quarantine period for dogs from Hawaii I would appreciate it.

Respectfully,

Lee Guertler MD, PhD, Fellow of the American College of Cardiology

.....
Given the strict guidelines that Hawaii has maintained because of dealing with Guan, Micronesia, and the US mainland as well as the obvious necessity to comply with the paperwork and testing mandated by NZMAF before flying to NZ I feel certain that no pet owners who make it past Hawaii vet screening would be an issue.

Given the problems we in Hawaii have seen from the above mentioned areas it's no wonder MAF wants quarantine. I would agree---- just not for Hawaii and Australia

Lee Guertler MD, Private Importer, Hawaii

12. Dear Ms Richmond:

I am writing to support the request that DOGS FROM HAWAII be placed in the same category as Australia and be allowed to travel to New Zealand without an additional 10 day quarantine.

Specifically, the Jack Russell terriers owned by Drs Lee Guertler and Della Lin are experienced travellers and not fractious animals. They have short white hair making external examination a practical and simple procedure, and are used to being examined on entry to New Zealand by MAF staff. They travel to New Zealand with their owners multiple times yearly, remaining for 4-6 weeks each time. All NZ MAF import regulations and animal examinations have been carefully conducted in Hawaii prior to every visit to New Zealand. There have been no incidences of external parasites or problems relating to the dogs with regard to any of the other diseases on the MAF watch list. The proposed double dose protocol of a topical agent would result in a 100% kill of the common brown dog tick, which is the only tick found in Hawaii.

Placing these dogs in a 10day quarantine so the proposed mandatory examination by a veterinarian rather than a MAF inspector can be conducted will result in them being quarantined 30-40 days every year and would be an undue hardship. Treating them in the same manner as dogs arriving from Australia would create no biologic risk to NZ-MAF since Hawaii quarantine and the professional standards of Hawaii veterinarians have always been at the highest level.

Therefore, I am formally asking that HAWAII BE PLACED THE SAME "NO ADDITIONAL QUARANTINE" STATUS AS AUSTRALIA.

Modifying the proposal to read:

"Animals arriving from all countries except Australia and Hawaii will be sent to post-arrival quarantine for a minimum of 10 days. This will allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health" would be a reasonable change given the data available and would not significantly impact the proposed process as there are few animals travelling to NZ from Hawaii.

Sincerely,
Dr Lisa Kam, Veterinary, Hawaii & John, Qualified Pet Services, New Zealand

13. To Whom It May Concern

I share a significant concern as an international shipping agent and an international dog enthusiast and make my submission accordingly

I agree that the global biosecurity risks to NZ must be managed BUT according to the real risks and not the perceived risks. . Part of this risk management must be based on the completion and ongoing relevant research and analysis to permit sensible valid levels of risk management for the particular risk from that particular country or country.

I do suggest at this time there is insufficient quantifiable and qualitative evidence available to those who may make these decisions to draft up new guidelines. I do not agree that MAF alone are tasked or responsible to the status quo ALONE and without the research information from the international community of which NZ is part. for example requiring quarantine for dogs entering NZ from risky countries - should lie at the borders of those countries - and not ours -we should have no requirement for quarantine for any period whatsoever only in exceptional circumstances of "lockdown" - and this would only probably be for rabies. Dogs arriving at our borders must not have been sent unless they are cleared by the exporting country. Why have a 2 bite at the cherry?? Does it once do it properly and record and publish and re-assess and modify to increase or lessen the restrictions should the actual level of risk increase. Example two- Why alter UK / Sweden protocols where dogs can be exported into NZ directly from Sweden. Why does NZ have to "treat FOR rabies to these countries?? Some common sense is required- not just more restrictions costs and without any relevance to the actual level of risk?? There has been no rabies reported into NZ UK or Sweden?? IT is overly bureaucratic and lacks the BIG picture.

So a review is well timed and I support this. HOWEVER please establish and prove the reasons why with quantifiable data not a blanket provision- set out what purpose and to achieve what for what risk from what country for those diseases based on the facts...

Given pet passports schemes in countries of origin and protocols- please don't add yet another list of risk management to OUR MAF - unless situation demands it.

The revenue - costs and benefits must support "less" rather so than "more" and if user pays

remains then as a user we have the right to transparency and further comment.

Dog owners and NZ citizens pay for this demanding requirement - and from much experience it is overly beaucroatic and inefficient and unnecessarily expensive - Utilising professional vets to manage and monitor with modern technology and information and treatments surely should suffice and therefore adopting a less approach to MAF involvement without good reason in many cases is my preferred approach

Well done to ask us our opinions. I suggest the NZ dog community is invited to comment- NZKC included. Independent surveys to determine the effective of current protocols/levels of risk management -treatments etc and what is best for the future 10 years by users shippers and animal -veterinarian groups and MAF professionals etc could greatly answer the questions we all have moving forward to appropriate legislation and risk management to suit the next decade.

Many thanks
William J Hansen, Shipping Agent, New Zealand

14. Hi Charlotte,

I have just a couple of points

The 10 day notice for short stay dispensation:

We have in the past had quite a number of Bitches in season that we are given 4 days notice to ship them out to Oz,

In most all cases we have had the dispensation completed in time for the dogs to travel, is this 10 day rule going to be strictly adhered to or can the odd one be rushed through?

Completed permit applications are processed in the order received, and every effort is made to process them as quickly as possible.

The time of arrival for inspection:

Is this going to be a vet inspection or will the quarantine officers continue to complete the inspection?

If flights are delayed due to airline reasons and the animals are to be put into quarantine, at whose cost?

Best Regards
Matt Walker, Donquest Kennels, New Zealand

15. Can you please clarify the new regulations for me in Bahrain?

I currently am flying the animals BAHRAIN - SINGAPORE - AUCKLAND - all Category 2 countries.

By flying them this route there is no requirement for the rabies anti-titre blood test. (Will this still applies).

Is the six month residency of an animal still a requirement - for instance any animal coming to NZ from Saudi Arabia must do a six month residency in Bahrain - have a rabies vaccination in Bahrain the day after it arrives here from Saudi (regardless of having Saudi rabies vaccinations) - then wait out the six months residency.

Linda - please clarify - I have a lot of Kiwis coming home and whilst they are pleased with the reduction in the Quarantine time (more from a money point of view) they are not happy with the open door policies coming out.

By the way - we are having demonstrations etc. here in Bahrain starting tonight for a few days. America's poking its nose into the Arab World again.

I look forward to your reply as there are a lot of Kiwis muttering about going home and they all have animals.

Kind regards
Norma Dennis, Pet Exporter, Bahrain

16. Dear Ms. Richmond:

I have reviewed the document above, along with the Draft Guidance Document and the Draft Risk Management Proposal. I understand the Ministry's efforts to ensure the safe Health of animals, agriculture and forestry in New Zealand. However, after review of the information, I believe that Hawaii-- like Australia-- should have fewer mitigation measures due to Hawaii's Health Status. The drafted Standards will place unnecessary additional complexity, paperwork and burden for pets being imported and exported between Hawaii and New Zealand.

I) Concern: The documents indicate that there are several important exotic viral, bacterial, And parasitic diseases, as well as canine transmissible venereal tumour, which could Become established in New Zealand. Several new and revised measures to mitigate these Risks are established. Only one of these appears to be connected to a need to examine Animals post arrival for the delayed appearance of disease—namely exotic ticks.

- Facts: Hawaii, upon consultation of veterinarians in our state, does not have Exotic ticks. We only have the brown tick, which is easily managed through the Topical measures pre-importation. Furthermore, our dogs have short, white coats which would make any improbable ticks easily visible. Finally, our dogs have never had ticks.

II) Concern: The documents also express a concern for the shift in practice from inspector clearance to veterinarian examination.

- Facts: Our dogs have been shipped with the expert efforts of Qualified Pet in Auckland. If necessary, we would be willing to make a veterinarian examination through Qualified Pet during the several hour layover between Auckland and Palmerston North a part of our pets' entrance. This would relieve that burden from your system.

III) Concern: Finally, we have particularly unusual circumstances. We have property and have invested a significant amount of time and money, from our perspective, into the business that we operate in New Zealand. We believe that we have improved the land and contribute to the vitality of the community in the Wairarapa. Our pets are a significant part of our family and investment, and they travel with us several times a year between New Zealand and Hawaii. Because of this frequency, a mandatory quarantine every time is a heavy burden and frankly, impossible. Our record of compliance and health with the importation and exportation of our pets through MAF has been exemplary.

- Facts: We would be open to a separate avenue through which we could achieve quarantine exemption by applying for equivalency to Australia. Please advise us if MAF would approve that route.

The bottom line is that we have invested seven years into being a part of New Zealand. We would like to do everything possible to allow that relationship to continue. The draft standard as it presently stands would have undue hardship and unintended consequences. We respectfully ask you to minimize the mitigation measures for our Hawaii pets

travelling to New Zealand.
Please do not hesitate to contact me at XXX.

Thank you in advance for your efforts towards a less burdensome ruling.

Sincerely, Della M. Lin, Private Importer, Hawaii

17. To Charlotte Richmond,

My wife Wendy and I manage the 1200 acre farm of Lee Guertler and Della Lin (Hawaiian residents) at Riversdale in the Wairarapa. Lee and Della bought the property 8 years ago at which time it was a run down sheep farm. Through major investment in fencing, topdressing, maintenance and livestock the property has been turned around into a developed deer farm during which process many local contactors have been employed. Lee and Della, both highly qualified health professionals, visit frequently and bring their much loved pets with them. In fact their decision to invest in New Zealand in no small way was influenced by the fact that when visiting to recharge batteries they could bring their pets too... Which process has been relatively simple though not inexpensive? I believe if Lee and Della are unable to bring their companion animals with them to New Zealand-which would be the practical consequence during a normal 2-3 week visit of proposed 10 day quarantine- their interest and investment in New Zealand may come to an end

We have all become aware recently of the Catdog.gen draft which seeks to address risk of import of diseases and parasites. While all of us in NZ dependent on agriculture certainly applaud diligent border controls in this regard we must also be mindful that special cases of healthy friendly nations should not be carelessly or clumsily handled where in fact risk is miniscule and existing systems have not been found wanting in any way.

Accordingly I request that Hawaii's present status be retained or if Hawaii is to be placed in a grouping then the appropriate grouping would be with Australia.

Historically New Zealand and Hawaii have had minimal difficulties moving animals between each other.

This no doubt reflects our similarities i.e. geographically remote islands in the Pacific with unusually few diseases and parasites.

I am unaware of any change in that status for either country.

It should be noted that although Hawaii is one of the United States it is distinctly different from the mainland States in terms of disease and parasites and has strict border controls for animals travelling between itself and the mainland.

Accordingly it can still in my opinion continue to be regarded as a very low risk location and I question the merit of lessening its status as it is in fact virtually equivalent to New Zealand in terms of disease/parasite risk.

I note Australia is accorded minimal restrictions in terms of animal movement between our countries but would suggest that Australia has considerably more undesirable species than Hawaii so it is illogical to impose more restrictions on Hawaii.

The draft risk management CATDOG document highlights a number of undesirable species/diseases but it seems of these Hawaii has only the brown tick. Note that both Australia and New Zealand presently have brown ticks so Hawaiian imports pose no threat of bringing an undesirable new entrant.

Therefore I request that Hawaii's present situation be retained to enable continued simple animal movement between us.

Like all New Zealanders involved in agriculture I certainly agree border controls to protect our minimal disease status are desirable. But as noted in the case of Australia where the

departure point of the visiting animal is of equivalent or superior status to New Zealand risks can be protected against by the present system which has been serving us well!

Thank you for your consideration of these comments,
yours faithfully,
Adrian Moody, Private Importer, New Zealand

18. Dear Ms Richmond:

I am writing to support the request that DOGS FROM HAWAII be placed in the same category as Australia and be allowed to travel to New Zealand without an additional 10 day quarantine.

Specifically, the Jack Russell terriers owned by Drs Lee Guertler and Della Lin are experienced travellers and not fractious animals. They have short white hair making external examination a practical and simple procedure, and are used to being examined on entry to New Zealand by MAF staff. They travel to New Zealand with their owners multiple times yearly, remaining for 4-6 weeks each time. All NZ MAF import regulations and animal examinations have been carefully conducted in Hawaii prior to every visit to New Zealand. There have been no incidences of external parasites or problems relating to the dogs with regard to any of the other diseases on the MAF watch list. The proposed double dose protocol of a topical agent would result in a 100% kill of the common brown dog tick, which is the only tick found in Hawaii.

Placing these dogs in a 10day quarantine so the proposed mandatory examination by a veterinarian rather than a MAF inspector can be conducted will result in them being quarantined 30-40 days every year and would be an undue hardship. Treating them in the same manner as dogs arriving from Australia would create no biologic risk to NZ-MAF since Hawaii quarantine and the professional standards of Hawaii veterinarians have always been at the highest level.

Therefore, I am formally asking that HAWAII BE PLACED THE SAME "NO ADDITIONAL QUARANINE" STATUS AS AUSTRALIA.

Modifying the proposal to read:

"Animals arriving from all countries except Australia and Hawaii will be sent to post-arrival quarantine for a minimum of 10 days. This will allow time for a thorough inspection of the animal by an official veterinarian in a calm environment, time for engorgement of any ticks still present, a thorough documentation check, and confirmation of clinical health" would be a reasonable change given the data available and would not significantly impact the proposed process as there are few animals travelling to NZ from Hawaii.

Sincerely,

Louise Moody, Private Importer, New Zealand

19. Dear Ms Richmond,

I am writing to make a submission regarding the proposed new regulations regarding the possible quarantine requirements of animals travelling from Hawaii to NZ.

I understand how important it is to protect the borders of New Zealand, however I see absolutely no merit in requiring a 10 day quarantine of dogs travelling from Hawaii to New Zealand given that Hawaii has only the common brown dog tick which under the current NZ

MAF import regulations and animal examinations does a perfect job of thoroughly examining animals and effectively protecting our borders. I believe a 10 day quarantine would place a great deal of undue hardship on the dogs with no foreseeable difference in effectiveness to that of the current NZ MAF import regulations and animal examinations, not to mention the horrific extra expense for those persons that travel between Hawaii and NZ regularly with their dogs. Treating them in the same manner as dogs arriving from Australia would create no biologic risk to NZ-MAF since Hawaii quarantine and the professional standards of Hawaii veterinarians have always been at the highest level.

I would therefore formally like to support retaining a system for transport of dogs between Hawaii and New Zealand that does not mandate post arrival quarantine.

Sincerely,
Brent Moody, Private Importer, New Zealand

20. Dear Ms Richmond,

I would like to make a submission regarding the proposed new regulations regarding the possible quarantine requirements of animals from Hawaii to NZ.

I have been involved in the development of a farming operation in the Wairarapa with Hawaii residents Lee Guertler and Della Lin for the last 7 years. They have been required by the NZ Overseas Investment Commission regulations when purchasing their farm to substantially improve the farm and to provide ongoing employment for local workers in order to have the privilege of owning land in NZ. This has been a lengthy and expensive process.

One of the main reasons for Lee and Della to invest in NZ was because they could bring their dogs out to the farm with them when they come to visit and enjoy the freedom of life on a farm which they don't have access to in Hawaii.

Lee and Della have adhered to all the NZ requirements that were set out for them to enjoy this lifestyle.

I think it would be very unfair if they were penalized now by not being able to freely bring their dogs with them when it appears that the status of animal health between Hawaii and NZ has not altered which means that the quarantine requirements are actually not necessary.

I would therefore like to support retaining the present system for transport of dogs between Hawaii and New Zealand.

Thank you for your time.

Yours faithfully,
Wendy Moody, Private Importer, New Zealand

21. Dear MAF Biosecurity New Zealand

Thank you for the opportunity to comment on your draft IHS for dogs and cats, and associated documents.

AFCD supports the following requirements:

- to only require one FAVN or RFFIT test prior to export rather than two
- two treatments for ectoparasites is far more effective than just one treatment within 4 days of shipment

- the removal of testing for hookworms and use of two treatments
- the PCR for Babesia gibsoni and that 2 samples must be taken 30-37 days apart; the removal of the blood smear is logical taking into account current diagnostics available
- the deletion of the statutory declaration as this posed numerous problems for certain owners
- the removal of the requirement to state the drug dosages for many of the treatments; this removes the possibility for typographical errors
- the requirement for just 10 days of post-arrival quarantine rather than 30 days.

AFCD would suggest that the testing/treatment for Babesia canis is extended for all countries rather than just South Africa. Although Babesia canis rosi has only been reported in South Africa, most countries do not have import requirements specific to this subspecies of Babesia canis so it can be assumed that many countries may have this parasite. This would be consistent with MAF's measure for Babesia gibsoni where all countries are required to test.

AFCD cannot comply with the requirement of an official veterinarian and a local veterinarian inspecting the animal within 24 hours of the time of export. In Hong Kong the flights to New Zealand depart at 7pm, and animals need to be at the airport 4 hours in advance of the flight. To have the animal inspected by a local veterinarian and complete the certification, and then have the animal inspected by an AFCD veterinarian, check the certification and complete the certification, and then the animal has to travel to the airport, is not physically possible. AFCD would kindly request that the 24 hours is extended to 48 hours as is the current practice.

AFCD would also request that the inspection be completed solely by the local veterinarian (as is the case for all other countries, including Australia) and AFCD only check and countersign the documentation, and then apply the seal to the cage (as is the case for Australia). The identification of the animal will be verified by AFCD airport staff and then the animal placed into the container and sealed (see below). AFCD has the up most confidence in the inspections completed by our local veterinarians.

AFCD understands that MAF has had some issues with animals arriving with ticks in the past and would like to know if any of those consignments originated from Hong Kong. If so then we would like to follow up these cases as we want to ensure the accuracy and integrity of our certification. Please can MAF confirm this?

The current practice is that AFCD have been only sealing the container at the airport as the official veterinarian is not located at the airport and AFCD do not have enough resources to have official veterinarians located at the airport. So the seal number is noted on the official documentation but an additional certificate is provided by AFCD airport staff. This certificate states that the animal's microchip has been scanned and is correct, after which the animal is placed into the container and it is sealed.

These draft requirements are far more pragmatic than the current requirements and achieves the same risk management levels compared to the current measures in place but for far less cost to the exporter. This will result in many more people wishing to take their pets (which some consider children) to New Zealand when they relocate their from Hong Kong. AFCD appreciates this.

Kind regards

Dr. Grant William CLARKE, Agriculture, Fisheries and Conservation Dept., Hong Kong

22. Dear Charlotte,

Thank you very much for giving my wife and I the chance to read the rules and regulations and proposals concerning the importation of animals into N.Z. and in our case, cats.

First and foremost we are delighted to see the quarantine period dropped to a minimum of ten days as this would have been a huge cost for us taking in to account we have thirteen cats.

I believe the draft proposal, if it should come into affect will become much more attainable to us but still maintaining the standards you require.

As you may be aware the Cook Islands Govt. does not have animal health inspectors, per se, but there is a non-profit veterinary organization from the United States that has been operating on the island over the past 16 years. The organization is called Esther Honey Foundation. The current administrator, Gregg Young, g4young@gmail.com, would probably have documentation on diseases etc which may be of concern. He is a very approachable and can be contacted on this email address.

On a lighter note I would like to point out that probably most cats on the island came from N.Z.

Secondly, we are a very small island in the middle of the Pacific Ocean, a thousand miles from anywhere in each direction and in my humble opinion it would be difficult for exotic diseases and parasites to establish themselves here.

Thirdly, my wife and I being avid lovers of animals and having owned numerous over the past six years have not so much as found a tick. I realize this is not a scientific way of making a determination, but I present the information anyway.

Thank you for your time and consideration.

Sincerely,
Chuck Pettis, Private Importer, Cook Islands

23. Submission from Shado-Lans

The Risk Management Dogs and Cats quote the World Trade Organisation Article 3.1 as justification for the review of the current Import Health Standards.

Article 3.3 of the WTO states – where measures providing a higher level of protection than international standards can be applied, if there is scientific justification, or if there is a level of protection that the member country considers is more appropriate following a risk assessment.

The above Article should be applied to New Zealand. New Zealand holds a truly unique position in the world, in that our isolation has kept us free of a number of pests, which have the potential to adversely affect our economy in the tourism and agricultural sectors. By relaxing our border security with the adoption of the proposed Risk Management, we potentially open our doors to a number of NZ MAF identified ectoparasites. New Zealand is not a part of Europe, Asia or the USA, where crossing a border is merely a matter of crossing the road. We are an island nation and this in itself, coupled with our vigilant Border security has contributed to our clean, green image.

Support for the quarantine period to be 21 days rather than the 10 days as in the Draft Risk Management Document.

The mitigation of risk, particularly from the Brown Dog Tick, cannot reasonably be completed in a 10 day time frame as given in the Risk Management Proposal.

The Analysis on page 29 paragraph 4 states that Ticks can be very small before feeding on the animal and are difficult to find on long-haired or dark-coloured coats. Post-arrival quarantine provides a controlled and calm environment for conducting thorough inspections and allow for multiple inspections over time.

This paragraph identifies that a) Ticks are very small and difficult to find and b) that thorough inspections are needed over time.

Ticks 31.1 Hazard identification of the Risk analysis, paragraph one.

For example *Rhipicephalus Sanguineus* (Brown dog Tick) may take up to 21 days to engorge. The 21 days engorgement is also confirmed in numerous articles on these ticks.

Ticks Risk Assessment

31.2.1 – Since dogs are a significant pathway for the introduction of ticks, entry is assessed to be non-negligible.

31.2.3 3) The effects on the health of humans and animals may be severe. If an exotic tick were to establish, eradication would be difficult and expensive. The consequences are therefore assessed to be non-negligible.

2. Lyme disease is the most common disease transmitted by animals to humans and is carried in the jaws of the Brown dog Tick. This is a blood disease and is common in Europe and the USA.

The Risk Analysis identifies the need for controlled inspections over time to find ticks on imported pets. 10 days is not “over time”, but in fact an unacceptably short period of time, when it has already been identified by the authors of the Risk Management that ticks take 21 days to engorge. Ticks start off their adult life stage the size of a pin head and are extremely difficult to locate until they are engorged.

31.3.1

However, there is no known acaricide, or acaricide combination, that is consistently 100% effective for all ticks for any time period. An area of particular concern with fipronil was the poor control of ticks in the ears of dogs. Ticks may be resistant to a range of acaricides. Tick inspections are therefore an important adjunct to acaricide treatment since treatment alone cannot be relied upon. This is supported in the MAF “Surveillance” Magazine – The NZFSA Verification Agency supervising veterinarian at a quarantine facility in Auckland reported the discovery of a live tick on a three-year-old male Labrador dog recently imported from Malaysia. The dog had been treated with fipronil prior to export, in accordance with the Import Health Standard. The tick was removed and further treatment with fipronil spray was undertaken. A further search of the dog two days later revealed more live ticks, and the fipronil treatment was repeated. A third search found still more live ticks, and treatment was switched to permoxin and permethrin. One more tick was surveillance 37 (4) 2010 37 found two days later but further searches did not detect any more. The dog’s environment in the quarantine facility was treated with fipronil and permethrin throughout this period, and bedding used was destroyed. Further investigation with the dog’s importers indicated that no personal effects had been imported that might harbour ticks. The dog was re-tested for Babesia, with negative results. All these ticks were identified as *Rhipicephalus sanguineus*, the brown dog tick.

Also from the MAF “Surveillance” Magazine is a very comprehensive article entitled “Exotic Ticks and Fleas: A Growing Biosecurity Risk?”

A supporting Submission – “The Case for Quarantine of dogs to reduce the risk or ticks entering New Zealand”, written by Mr AGC Heath, Senior Scientist, AgResearch, 17 August 2010.

3. The “Surveillance” Magazine 23(4) 1996 contains a table which identifies hard ticks, ticks established in NZ as using the Brown Kiwi as hosts.

From The University of Florida Department of Entomology and Nematology

A fully blood-fed female brown dog tick can lay up to 5000 eggs; these ticks are tolerant of a wide range in conditions.

Summary

The present regulations allow for 30 days quarantine with a treatment of an acaricide within 72 hours of entry into New Zealand. The proposed changes take the quarantine period to 10 days with no treatment on arrival into New Zealand. This is an area of great concern as the minimisation of the quarantine requirements does not allow for a reasonable period to find ticks that are not engorged. The above sources have endorsed the undisputable fact that

there is no known treatment that is 100% effective and this does not allow for the fact that if the pet's owners bath their dogs 48 hours either side of the treatment they cancel out any effectiveness that the treatment may have had and many of the dogs owners like their dogs to be clean prior to their travel to their new country.

If the Brown Dog Tick is allowed to establish in New Zealand the consequences to our economy, pets and the victims of tick bites would be due to negligent reasoning that the effective quarantine regulations and time period currently in place, should be replaced and reduced to a dangerously shortened time period with lesser treatments all at the behest of a misconstrued WTO document.

Denise Clark – Shado Lans Quarantine Facility, New Zealand

24. Dear Charlotte

With regard to Draft Import Health Standard for Dogs and Cats, the Animal Health Division of Japan MAFF contacted us and asked the following questions.

MAFF Animal Health Division said they received the SPS Notification (G/SPS/N/NZL/447) and examined the draft IHS for dogs and cats, and found that they will not be able to comply with some requirements in the draft IHS.

1. BRUCELLA CANIS TESTING FOR DOGS (page 9)

MAFF Animal Health Division said a rapid slide agglutination test (RSAT) and a cytoplasmic agar gel immunodiffusion test (CPAg-AGID) cannot be conducted in Japan as diagnostic test kits for RSAT and CPAg-AGID are not available in Japan. Instead, MAFF Animal Health Division would like to propose to carry out a tube agglutination test only and confirm a negative result. The diagnostic kit for the tube agglutination test used in Japan sets the negative criterion being "not more than x160". As New Zealand does not set a negative criterion, is it acceptable for NZMAF if MAFF Animal Health Division uses the positive/negative criteria used in Japan for the tube agglutination test?

If NZMAF recommends or use any diagnostic test kits for RSAT and CPAg-AGID, MAFF Animal Health Division would like to know.

2. HEARTWORM (DILOFILARIA IMMIRIS) TREATMENT AND TESTING FOR DOGS (page 10)

In the draft IHS, "Dogs six months of age or older on shipment have been subjected to a heartworm antigen ELISA test with a negative result within 30 days of shipment" is required, but in Japan diagnostic test kits for heartworm antigen ELISA are not available. Instead, MAFF Animal Health Division would like to request NZMAF to approve a microfilariae concentration test as in the current IHS (page 11).

If NZMAF recommends or use any diagnostic test kits for heartworm antigen ELISA, MAFF Animal Health Division would like to know.

We are grateful if you could answer to the questions above.
Best regards,

Keiko Fujibayashi, Research Officer - New Zealand Embassy, Japan

25. Summary

My submission addresses issues particularly in relation to dogs

1. Rabies: Requirements should be consistent within the IHS

2. External parasite control: Treatment regime should be amended to provide better risk management
- 3 Babesia canis: Variance exists between the IHS requirement & provision within the model certificates
4. Timing of blood testing: Changing the requirement to “within 16 days” would make compliance a little less of a nightmare in practical terms
5. Short Stay provision: The short stay provision within the import health standard for Australia should be extended to 30 days and should apply to all approved countries. The risk from “recent infection” is no different in dogs visiting these countries for 30 days than for any other dogs being imported into NZ. Blood tests would not be required as there would have been insufficient time for seroconversion in the event of infection in that time. Treatments would be completed as per the IHS or in post arrival quarantine depending on the length of time overseas

The Import Health Standard should deliver effective management of the risks identified in the risk analysis consistently & logically without being unnecessarily restrictive to international movement of dogs & cats. The measures required to achieve this, by way of blood testing & treatment should be practical without making compliance unreasonably difficult to complete. I believe the draft IHS for dogs & cats on the whole provides a simpler & more rational management of the risks to NZ from imports of cats & dogs. The changes to post arrival quarantine represent a sensible safety net to protect NZ.

However, there are several areas which I believe should be reviewed

1. Rabies: The protocol for the timing of Rabies vaccination & antibody titre testing vary significantly between the requirements in part B of the IHS paragraph 13 d & part C paragraphs 33 & 34.

It seems illogical to have two different protocols to manage the same issue

One is for dogs originating in countries with rabies; the other is for New Zealand dogs prior to travel to countries with rabies.

2. External parasite control: External parasite control has 2 objectives, remove unwanted external parasites per se to remove them as vectors of disease.

With reference to the latter, the 2009 Import Risk Analysis suggests that the aim should be to ensure freedom from tick infestation for 30 days prior to export to manage the risk of recent infection within that period when animals would not be identified by seroconversion to tick borne diseases

However the regime, in the IHS, for achieving this philosophy appears to be flawed

“First treatment within 30dys of export & at least 2 wks before the second treatment which is to be given within 4 days of shipment” – practically this translates into the second treatment being done at the vet examination within 24 hrs of shipment and the first done 14 days earlier i.e. within 15 days of shipping.

This means that a tick free period in the 2 weeks prior to blood testing, to minimize the risk of recent infection, is not achieved

Requirement has been changed to:

The cat or dog was treated by a veterinarian TWICE with a topical product registered for the control of ticks and fleas at the manufacturer’s recommended dose and certified as free from external parasites at each treatment.

The first treatment was given within 21 to 30 days of shipment and the animal was free of external parasites.

First treatment/inspection date and product _____

The second treatment was given within two days of shipment and the animal was free of external parasites.

Second treatment/inspection date and product _____

3. *Babesia canis*: This organism is identified in the IHS as requiring risk management but in the model certificates there are no apparent controls except from S Africa, other than that afforded by external parasite control.

Is there a reason for this?

4. Timing of export blood tests: A compromise has to be reached between the ideal situation & the practical situation with regard to all blood tests & treatments.

The time frame in which overseas laboratories will guarantee a turn around has to be taken into account as well as having the blood taken, freighting it and receiving the report back in order to do the final certification within 24 hrs of export.

In practical terms, where the guaranteed laboratory turnaround is 7 working days* plus 2 days to have the blood taken & be received at the lab plus 2 weekends which become part of the time frame and then get the final examination & certification done in the last 24 hrs adds up to a schedule of 14 days with no room for error.

I recommend "within 14 days" should be changed to "within 16 days" to help with the nightmare of meeting the import protocol.

*This is based on Weybridge CVL turnaround time of 3 yrs ago – I am unaware if this has changed or what the situation is in other countries.

5. Short stay provision: In the draft IHS there is provision for 10day Short Stay to Australia which has been include presumably because of demand for this facility. Increasingly dog owners want to take their dogs overseas to compete at shows, dog trials and other dog sporting events staying only a short time overseas.

To accommodate this situation I believe that provision should be made within the IHS for stays of up to 30 days to all approved countries.

This would require a model certificate be drawn up to cover this situation which would then remove the need for dispensations to be sought on a case by case basis – simplifying the system both here and overseas.

Currently if dogs go overseas for less than 14 days it is impossible to comply with the draft IHS & dispensations would be required & for those staying up to 30 days the draft IHS is unscientific

The particular situation for these dogs is

a) Their health status is known prior to export (provided they have been resident in NZ for 6mth prior)

b) Even at the maximum stay of 30dys they are not going to show positive serology with testing within 14 days of shipping therefore blood tests are of no value

c) It is important to remember that the risk factors for these dogs are no different to any dog being imported into NZ from any approved country in that "possible recent infections" i.e. within the 30 days prior to shipping - either prior to blood testing or between blood testing & export presents a challenge for risk management.

The draft IHS has adopted measures which by experience & changes to the previous protocol minimize these risks.

The post arrival quarantine period provides something of an additional safety net

Taking account of the above, a practical model certificate can be produced which ensures a consistent logical approach to short stay situations of up to 30 days for all approved countries. This removes the need for time spent on case by case assessments & dispensations which also create issues with certification overseas

This certificate should include

Continuous residency in NZ for 6 months prior to the commencement of the short stay

Internal parasites

Treatment within 24 hrs of leaving NZ & second treatment within 4 days of shipment

External parasites

Treatment within 24 hrs of leaving NZ & second treatment within 4 days of shipment

Brucella canis testing
Blood test not required because will not have seroconverted
Recommend include an advisory leaflet on the disease and how to minimize the risk of infection
Heartworm
Treatment within 4days of shipment
Blood test not required
Babesia gibsoni
Blood testing not required
Risk management by external parasite control
Leptospirosis
Treatment within the short stay or post arrival quarantine
Examination
As for standard certificate

Post arrival inspection & quarantine (10day) would apply, except for Australia

For countries where Rabies is absent or well controlled the requirements for Rabies management in the draft IHS would apply to short stay dogs.

6. Housekeeping matters: Model certificate short stay Australia
Reference is made to dispensation for Babesia canis testing – should that be gibsoni

Model certificate – Rabies absent or well controlled
Heart worm testing & treatment do not appear in same paragraph as they do in the other country certificates – logically they should appear together

Marion Wilson, Veterinarian, New Zealand

26. Dear Ms Richmond

My husband and I would like to register our support for any changes MAF are contemplating regarding the quarantine rules for cats and dogs entering New Zealand.

I won't go into too much detail in this email but if you would like to know more about what we experienced when we brought our dogs and cats back home to New Zealand from the United States of America please let me know. I can tell you that the emotional impact on our family was extremely high and we were very fortunate that the financial ramifications were not a concern for us, others aren't as lucky.

Yours sincerely

Julie Clayton-West, Private Importer, New Zealand

27. BARNZ members have a direct interest in this standard through member airlines transporting

Cats and dogs into New Zealand from Australia and from other countries from which movement of these animals to New Zealand is permitted. Air NZ and Menzies, who are the cargo terminal operators (CTOs), are also members of BARNZ. The animals are moved from the aircraft to the CTOs' premises before leaving the airport. BARNZ profile and an explanation of how we process submissions such as this is attached. This submission has been agreed by the key BARNZ members. Individual members may, however, also make submissions which could provide MAF with more detailed concerns or comments.

REACTION TO PROPOSED IHS:

Our reaction to the proposed Import Health Standard for Cats and Dogs is as follows:

1. We assume that the reason for tightening up the standards and introducing the compulsory vet clearance is based on a researched risk analysis which shows that this change is necessary. Certainly from the airlines' and CTOs' point of view the current practice of clearance on arrival (24 x 7) by a MAF officer has worked well. If Vet clearance is to become the standard, we request that consideration be given to the Vet service being made available outside the advertised operating hours on the basis of advanced notice with a cancellation fee if the animal is not shipped.
2. We seek an assurance that MAF has worked with the Customs Service in developing this new procedure so that either Customs will be on hand to clear incoming animals before they are moved to a Transitional Facility (TF) or the TF will be licensed as a Customs Bonded Facility thus allowing the animal to be moved from the CTO's premises to the TF on arrival.
3. The change to requiring a vet clearance for cats and dogs from Australia and restricting the hours at the NZ airports (coupled with no vet services over the weekends or on public holidays) will cause logistical problems and result in additional costs for the importers. Animals arriving from Australia when a vet is not on duty will need to be moved to a TF. An issue will be liability for the costs of quarantine if an aircraft disrupt or delay causes a flight, which was programmed to arrive within 'vet hours', to be late — given that the transport has been pre-paid.
4. We point out that the very restricted hours for vet availability in Christchurch and Wellington will mean that up to 50% of incoming trans-Tasman flights will arrive outside of vet hours. This will restrict the number of flights that people can bring or send their pets on without incurring extra costs and delays through quarantining.
5. The requirement that uncleared animals cannot travel on the same domestic aircraft as domestic animals which are accompanying their owners (or as cleared animals) will create significant problems for domestic air carriers because they cannot be sure that a domestic passenger travelling from, say, Auckland to Wellington will not turn up with their cat or dog to be transported with them. Domestic carriers who are transporting uncleared animals would be put in the position of having to either decline the carriage of the domestic or the cleared animal, or of adopting a policy of not carrying uncleared cats or dogs on domestic flights because it would not be possible to guarantee an 'animal free' flight for an uncleared animal. If the latter policy were adopted, which would seem to be likely, it would lead to extra pressure on the Auckland TFs.
6. In this regard, we are concerned that the TFs in Auckland may not be able to cope with the additional numbers of animals resulting from the adoption of the above policy and the arrivals ex Australia outside Vet weekday hours. We ask that, before the new system is introduced, an analysis is done based on numbers of imported animals over the last couple of years.
7. Our understanding is that the responsibility of the airlines under the proposed regime will be to advise MAF at least 72 hours before the arrival of the animal in New Zealand. The accompanying documentation is the responsibility of the shipper, and the booking for the TF and land transport arrangements from the CTO's premises to the TF is the responsibility of the importer. For animals from Australia which are cleared at the border by a vet and are going to move to a domestic flight, the importer will continue to take the responsibility to arrange Customs clearance and care of the animal until it is delivered to the domestic flight.

CONCLUSION:

We believe that the new system will be workable, provided that:

- MAF can explain and justify the change to those shippers, passengers and importers who

will experience increased costs and frustrations as a result of the proposal; and

- Our understanding of how the new system will work and, in particular, the responsibilities of the various parties as spelled out in item 7 above, is correct; and
- The TFs will be adequate for the task; and
- The NZ Customs Service establishes the TFs as Licensed Bonded Facilities; and
- The shippers and importers are well briefed and understand their roles and responsibilities.

Having said that, we are bound to point out that, in terms of facilitation, the proposal represents

a significant step backwards and there are likely to be complaints from owners of the animals.

In this context, we ask that further consideration be given to the Vet Service being made available outside the advertised operating hours on the basis of advanced notice with a cancellation fee payable by the importer if the animal is not shipped.

John Beckett, Executive Director, Board of Airline Representatives NZ

28. Dear Charlotte

Just a quick note to say that support the proposed changes 100%.

This will not only make it more affordable for persons wishing to immigrate to New Zealand, but also ensure a quicker reunion of the dogs and cats with their owners.

Well done on this great initiative!

Laetitia Roelofse, Private Importer, South Africa

29. Some details of the proposed new Import Health Standards for cats & dogs are welcomed, but as noted below, some areas must be readdressed.

1. Quarantine period of 10 days from all acceptable countries except Australia.

Although this seems to be a way to simplify requirements, it could expose NZ to risk from some areas (such as certain Ticks), as 10 days is less than the initial larvae period for some ticks. A reduction in quarantine time could be warranted for a number of countries, however applying the same time to virtually all countries seems a retrograde step.

With reference to the countries that currently have no quarantine requirement, what risks have prompted this change?

2. Import Permits

Again, why the change to the countries that currently do not require import permits? If the intention of these amendments is to reduce the workload on the available resources, this one counters that.

3. Biosecurity clearances from Australia

The requirement for this to be completed by a MAF vet is again affected by the available resources. It would possibly be appropriate for qualified, approved practicing vets to be appointed to do this on a contract basis, or at least be available if the current MAF inspection staff found a problem.

4. Acceptance times for flights from Australia.

This is dramatically reducing the options for pet owners coming to New Zealand, & also the import of pedigree dogs & cats – in the case of Wellington, it halves the available flights (it reduces Brisbane to 2 available flights a week).

The changes will have a marked effect on all centres, but in particular Wellington. MAF are already restricting the availability of their resources in the Wellington area, & this is now taking it to the stage where it could be regarded as a restraint of trade. Animal exports & imports are not only a source of overseas funds, but they also help Wellington's freight handling figures to some extent. Also, there seems to have been no consideration given to the additional costs these changes will impose on pet owners.

The notes above are a summary only. I would welcome the opportunity to discuss this further.

Mike Mune, Dandy Dogs, New Zealand

30. Dear Ms Richmond,

This is a submission of my support for the proposed changes to the tests for importing dogs and cats, and specifically the reduced Quarantine period.

Firstly, I can mention that these changes are definitely advantageous for NZ as a country. I personally contemplated immigrating to another 1st world country due to the lengthy quarantine period for my dogs, as there was no way I was immigrating without them and I was rather offended by the lengthy quarantine period.

Secondly I'd like to mention that I was not economically active in and for NZ for the first 3 months of being in NZ, as I could only visit my dogs during office hours in the week, which forced me not to find a job until I was totally satisfied that they were ok and the time was nearing for them to come out. So the first 3 months of my life in NZ was spent in QPS (not a nice thought!). This is not even mentioning the exorbitant costs of keeping pets in quarantine kennels.

Besides the emotional turmoil which a person goes through while one's dogs are in quarantine facilities for 120 days, the facts were that my dogs have always been up to date with their inoculations and were healthy dogs. I am only a member of public (and not a veterinarian or research analyst), but from my bit of research of the tests and outcomes, I felt that my dogs posed a minimal risk to NZ (due to their health and up to date vaccines) and if any risks were involved, these could've been mitigated by treatments or alternate tests / testing periods for babesia/ rabies etc. Which is, what I believe, taking place now – a restructure of the tests to still achieve the goal of ensuring a healthy NZ, but also taking into consideration the types and lengths of the tests / quarantine required.

For this I congratulate you and am extremely pleased to know that the future emigrants of this beautiful country do not have to endure the lengthy quarantine period we had to suffer through!

If you feel a need to contact me, please do so as I am more than willing to give any and all inputs I can for this matter. My contact details below.

Regards,
Domonique Roelofse, Private Importer, South Africa

31. Introduction

Jetpets Animal Transport is responsible for thousands of pet moves throughout Australia and the world every year and is a leader within the pet transportation industry. New Zealand remains one of Jetpets' most common International destinations with approximately one thousand moves for both companion and commercial purposes each year. This submission relates to the proposed changes by Biosecurity New Zealand, Ministry of Agriculture and Forestry, to the Import Health Standards for Cats and Dogs and the subsequent affects on the movement of dogs and cats from Australia to New Zealand. Jetpets Animal Transport acknowledges the importance of maintaining the Import Health Standards to protect the biosecurity of New Zealand but wishes to make the following points to assert the impact that some of these changes will have on pet owners and both commercial and logistic aspects of the business.

The submission also aims to provide workable solutions to allow the effective incorporation of the amended Import Health Standards into Jetpets' business management and operational system to better service client, supplier, airline, Government and other associated bodies. In turn, this will also serve to retain the positive and practical working relationship between these parties, Jetpets, MAF and Biosecurity New Zealand.

Key Interactions

- Biosecurity New Zealand / Ministry of Agriculture and Forestry
- Pets and owners: companion and commercial (including greyhounds)
- Jetpets Animal Transport (and other transport agencies; Australia and New Zealand)
- Australian Quarantine and Inspection Service
- Veterinarians – Australia and New Zealand
- New Zealand Customs
- Airlines
- Accredited Laboratories

Key Considerations

Jetpets see the following areas of the proposed changes to the health standard as requiring further assessment prior to implementation.

A. Impact of Designated Arrival Times for Biosecurity Clearance

Jetpets foresees that the amount of usable flights will be reduced by at least half by the implementation of these specified times for veterinary inspection and biosecurity clearance upon arrival into New Zealand. Some of these flight options are already limited from some Australian ports and to some New Zealand destinations.

With the proposed changes, the demand for these limited flight options will increase, further reducing flight availability and options to pet owners and exporters. The Brisbane to Wellington sector, for example, only has 2 flights per week that arrive within the proposed designated arrival time. The impact this will have on airlines servicing New Zealand must also be assessed. Clearance hours will also create problems when unforeseen flight delays, offloads resulting from cargo capacity, mechanical problems and weather restrictions occur, limiting options for next flight availability to arrive within clearance hours. Couple this with the new veterinary requirements and a situation arises where veterinary protocols would become non-compliant, therefore requiring applications for equivalence, further expense and operational difficulties.

Obviously any time in quarantine due to arrival outside of inspection times must be avoided. Consideration and provisions must be made to allow for biosecurity clearance options outside of these hours. Attention to the time difference between Australia and New Zealand coupled with the mandatory three hour cut of time the pets must be at the airport prior to the departure time must also be made before the Import Standard is finalised.

B. Australian Quarantine and Inspection Service

In general, Australian Quarantine and Inspection Service (AQIS) offices have regulated daily opening hours and set appointment times whereby they will issue export documentation. These factors therefore add to the considerations when arranging pet schedules to allow for compliance with veterinary protocols, laboratory scheduling, issuance of export documentation in line with compatible flights and airline cut off times.

C. AQIS Approved Laboratory Limitations

Currently only one laboratory in Australia, Vetpath Laboratory Services in Perth, Western Australia, is accredited by the Australian Quarantine and Inspection Service to conduct testing for *Babesia gibsoni*. Testing for this disease is limited to two days per week (Monday and Thursday). Time differences between Perth and Eastern States coupled with these limited days for testing further reduce the flexibility surrounding the proposed timing for blood sampling for *B. gibsoni* to be able to coincide with other treatments within the protocol. The complications are further discussed in Section E.

D. Final Pre-Export Veterinary Examination

Adjusting the final pre-export veterinary examination to be within 24 hours of shipment creates further limitations with respect to veterinary and airline scheduling. Allowing the final pre-export veterinary health clearance to be conducted within 4 days, or at least within 48 hours of shipment, would increase flexibility and practicality within these areas. This extension would also allow for increased availability when considering concurrent AQIS appointment and laboratory testing timing. The current standard allows for Monday morning flights to New Zealand with the issue of AQIS documentation performed on the previous Friday. Obviously, with the suggested time frame, these options will no longer be available, further affecting flight options and increasing demand for those arriving within the designated clearance hours.

Veterinary Treatment and Testing Schedule

Under the proposal, it is not practicable to perform all veterinary treatments in an efficient and timely manner, particularly when other components of the new standard along with AQIS, laboratory and airline factors discussed previously are taken into consideration. Also the distance of some clients from veterinary services should be kept in mind. The proposed changes increase the rigidity of the timing with respect to *Babesia* testing and endo/ecto parasite treatments in dogs, increasing the number of vet visits required, and therefore costs, and animal handling while reducing overall flexibility. Under the current import health standards (Section 22 of the Biosecurity Act 1993), Jetpets uses a formula to ensure that the necessary treatments are met while keeping the amount of vet visits, and therefore costs, for the owner and the pet to a minimum. This formula also maximises the efficient use of veterinary, Jetpets staff and other resources, thereby enhancing the logistical operation of moves to New Zealand.

The current formula used is:

Cats:

Vet Visit One: 72 hrs to 10 days prior to shipment

Fipronil treatment plus initial health check

Vet Visit Two: Within 4 days of shipment (generally the day prior)

Final pre-export health check

Intestinal worming treatment

Issue of AQIS documentation

Dogs:

Vet Visit One: 72hrs to 10days prior to shipment

Blood sampling for Heartworm and *Babesia* testing (timing may vary depending on client/vet/laboratory factors)

Fipronil treatment

Initial health check

Vet Visit Two: Within 4 days of shipment (generally the day prior)

Final pre-export health check
Intestinal worming treatment
Heartworm treatment
Issue of AQIS documentation

F. Proposed Veterinary Adjustments

If the dual endo/ecto parasite treatments stand, the adjusted time frames below will allow for coordination of initial treatments with blood sampling (dogs) and second treatments in line with the final veterinary examination. This regime will also work in more effectively with laboratory and AQIS schedules.

Heartworm testing: to remain within 30 days of shipment (will do at the time of blood sampling for Babesia)

Babesia gibsoni testing: sampling allowed within 20 days of shipment

First parasite treatments: within 30 days (at the same time as blood sampling) and at least two weeks before the first

Second parasite treatments at least 2 weeks after the first, within 4 days of shipment (at health check time)

Final pre-export examination preferably to remain to be within 4 days, if not then within 48 hours.

Scheduling example:

Vet Visit One: 15-20 days before travel

Microchip (if required) (dogs and cats)

Blood sample for Heartworm and Babesia testing (dogs)

First ecto/endo parasite treatment (dogs and cats)

Initial health check (dogs and cats)

Vet Visit Two: Within 48 hrs of travel

Final pre-export veterinary examination (dogs and cats)

Second parasite treatments (at least 2 weeks after the first)
(Dogs and cats)

Heartworm treatment (dogs)

Issue AQIS documentation (dogs and cats)

G. Greyhound Industry

Jetpets services many clients within the greyhound industry in both Australia and New Zealand. Due to the nature of the industry, training regimes, distance from accredited vets and other factors, the minimal time frame required to comply with the veterinary standards is always preferable. Among other things, this reduces handling, costs and transport to and from premises and allows for further convenience for greyhound clients. In conjunction with the impact of clearance arrival times, the implementation of the proposed veterinary changes will greatly disrupt the mechanics of this component for Jetpets' greyhound clientele. Further analysis into the effects on the greyhound industry (Australian and New Zealand) is advised.

H. Microchipping

Jetpets agrees that microchips are advisable to ensure accurate pet identification with the corresponding microchip number listed on all corresponding documentation. Acceptance of older style 10 digit trovan, destron or fecava microchips would also be advised (if compatible) to prevent unnecessarily microchipping pets with existing microchips.

I. Residency Equivalence

Should the status of owner/s change upon arrival into Australia, there may be a requirement from time to time to allow scope for dispensation should animals require transportation to New Zealand within 6 months after release from Australian Quarantine.

J. Provision of Original Documentation

In many cases, time and distance factors lead to different veterinarians performing the initial and final veterinary treatments and associated paperwork. Subsequently, faxed copies are sometimes the only available documents. Also, laboratory results for canine Babesia and Heartworm testing are received via facsimile or email due to the short time frame between the laboratory testing date and the date of export. Both factors and the occasional last minute change required, for example due to a typographical or omission error by the submitting veterinarian, can sometimes lead to copies of veterinary treatments and tests being the only forms available in a timely manner to enable AQIS authorisation prior to the scheduled time of export. Jetpets suggests that copies of any initial veterinary treatments and laboratory tests be allowed provided they are certified by AQIS and accompanied by original final veterinary certificates and AQIS documentation. Jetpets also requests clarification on the proposed sample zoosanitary certificate and whether the Owner/Exporter Statutory Declaration with respect to prohibited breeds of dog and the Owner/Exporter Declaration regarding age and pregnancy status of the animals will be replaced by the contents of the Model Veterinary Certificate A for Cats and Dogs from Australia.

K. 72 Hour Notification

Jetpets Animal Transport requests clarification on whether the notification 72 hours prior to arrival is to be performed by the airline, the owner or exporter and the method of notification that should be used.

L. Transition Period Recommended

Upon implementation of any changes to the Import Health Standard, Jetpets recommends a transition period to ensure compliance with the amended standard is achieved. An additional provision of lenience for a period following introduction will enable any issues that arise to be assessed and worked through collectively before any quarantine and / or other penalties are imposed. This will also allow the review of the practical aspects associated with the changes to ensure they are working for all involved.

Summary

Jetpets Animal Transport appreciates the stance adopted by Biosecurity New Zealand in order to manage hazards and their risks to ensure an appropriate level of biosecurity protection is provided. However, the implications of the changes within the health standard are far reaching, with impacts on owners, exporters, veterinarians, industry bodies, government departments, laboratories, airlines and other key stakeholders. The interactions between these sectors will be significantly affected if the conditions outlined in the current draft documents are approved. Additionally, the commercial and operational consequences to Jetpets Animal Transport will be highly significant with detrimental effects on overall services for pet transportation to New Zealand. Therefore, further assessment of the aspects outlined in this submission must commence in order to reach a more viable outcome for all. Finally, Jetpets Animal Transport wishes to thank Biosecurity New Zealand for the opportunity to comment on the proposal and to be able to provide further considerations and practical recommendations prior to the integration of the new standard. In addition, Jetpets Animal Transport is willing to work further with Biosecurity New Zealand in order to further develop the Import Health Standard for Cats and Dogs from Australia.

Jaime Berry, Jetpets Animal Transport, Australia

32. Dear Ms Richmond

Thank you for your time and patience with both sending me the initial documentation and then explaining the process.

I'm sure, like you, I'm committed to seeing New Zealand's borders secure from unwanted and undesirable pests and organisms.

I can also understand the desire to have standard rules and regulations.

In this case, however, I believe that Hawaii can fulfil that standard by being given the same status as Australia.

Hawaii, like Australia doesn't have exotic ticks and the brown tick can be treated the same way from Hawaii as from Australia.

As a non-veterinarian I cannot see any issue that Hawaii has that is any different from Australia. I could further suggest that the size of Hawaii would encourage a far better animal health regime than that of Australia.

Further from a farming perspective we have considerable investment locally from Hawaii.

Those investing are good local citizens, responsible people and sustainable farmers.

Because of Hawaii's relative closeness, (closer than parts of Australia), they come over regularly for short periods of time. The proposed standard would mean that they would be unable to bring their dogs which would ensure unreasonable hardship and encourage inefficient farming practices.

Finally there is a system in place in the form of Qualified Pet which has been used successfully for seven years and is capable of continuing to do so.

Finally, as I've already stated, I am committed to strong and robust border security. Giving Hawaii dog importation the same status as Australia would compromise that.

Yours sincerely

Alan GH Emerson JP, Private Importer, New Zealand

33. Greyhound Racing New Zealand (GRNZ) is the authorising body for the Greyhound Racing industry in New Zealand. Each year around 600-700 Greyhounds are imported into New Zealand from Australia.

As Australia is an 'approved country' with:

No permit to import required

No post-arrival quarantine for compliant cats and dogs arriving at specified times of inspection

Post-arrival inspection required.

The main risks associated with the importation of Greyhounds is External Parasites and in particular Fleas and Lice. For fleas GRNZ would opt for option 2 (i.e. "Treatment as in option 1 and inspection, with certification that the animal is free from fleas within 3 days of travel") and for lice option 2 (i.e. "Veterinary certification that the animal has undergone pre-export treatment with an effective insecticide within 3 days of travel, and been inspected and found to be free of lice").

With regards to the other possible risks GRNZ believe that these will be adequately covered by whichever option is chosen.

Arrival Times for Biosecurity Clearance for Cats and Dogs from Australia

One of GRNZs stakeholders and a major importer of Greyhounds from Australia has asked whether or not the arrival times can be adjusted. This is due to the timing of the majority of flights that Greyhounds tend to travel on, for example one regular flight lands in Auckland at 1730 hours and therefore with the allowance of 2 hours for inspection an 1830 hours cut off could have ramifications. Is it possible to adjust as follows?

Auckland

0530 to 1930 hours

Christchurch
1200 to 1830 hours

Wellington
1330 to 1700 hours

Keith Coppins, Greyhound Racing New Zealand

34. To whom it may concern,

I have read all the literature on the Revised Draft copy of the Import Health Standards for Dogs and Cats (CATDOG.GEN 18 January 2011) and would like clarification on some issues of the Draft Standard.

Post-arrival quarantine

28. All non-compliant animals from Australia, and those arriving outside of the hours scheduled for veterinary inspection, will be sent to an approved transitional facility and remain there until all non-compliances are resolved and/or until biosecurity clearance is given.

I want to know how this will be supervised in the Auckland section as there are 3 Transitional facilities available to accept dogs and cats non compliant or after hours.

I would like to know what procedures are we to follow should a pet be due for release on a public holiday. Bearing in mind that in 2010 the following: Christmas Day, Boxing Day + 2 extra days and New Years day + 3 extra days?

Will the historic "Inspection by NZFSA vets within 72 hours of arrival or release" be maintained for all pets requiring the 10 day quarantine period?

I cannot dispute the Veterinary or Scientific aspects of the Review although I would be advising that ALL pets that are now listed in the Approved Countries for Dogs and Cats be required to spend 10 WORKING DAYS in quarantine before release.

Dogs and cats from Australia should also be required to spend 72 hours in quarantine and if fully compliant, be released.

Human error and cost recovery are my biggest concerns with the adoption of the new Standard and only time will tell if the foundation is secure.

Robyn van den Brink, Pethaven Quarantine Services, New Zealand

35. Hi,

Re: Import Health Standard for Cats and Dogs

Sorry for the late response, I was hoping to do a more formal response but the time has eluded me with the current circumstances down here even though we are not directly affected.

My submission is brief and I am relying on memory so please excuse me if I have miss read the proposal.

The introduction of limited hours at Christchurch appears to be for the benefit of the staff not that of the animal or the customers and therefore is not a valid reason to introduce such a

restriction, having imported through Christchurch in the past it is extremely difficult to hit the already limited operating window on long distance flights, reducing it as suggested will effectively mean all imports are held in the quarantine kennel.

Secondly I do not agree with the 10 day quarantine from countries that currently have a zero quarantine period, no evidence appears to be present to suggest this will benefit anyone except the quarantine kennels and again it does not help the animal. By all means reduce the quarantine period from other areas where the current quarantine is more than 10 days but I did not see any justification for this either so wonder where the idea came from, it does rather sound as if we have no evidence that the current quarantine is serving an effective purpose but we are introducing a 10 day quarantine just in case. Is this change for change's sake?

I suggest that rather than 10 day quarantine in quarantine kennels to detect ticks a house arrest with compulsory vet checks every 5 days for say 3 weeks would be easier on the animal and owners and reduce the work of the quarantine staff at the point of entry whom appear to be so over worked they can not attend to animal arrivals for more than a few hours per day.

Best regards.
Brian Falkingham, Mermalade Briards, New Zealand

36. Dear Ms. Richmond

Thank you for the opportunity to comment on the Ministry of Agriculture and Forestry Biosecurity New Zealand draft *Import Health Standard for Cats and Dogs*, the draft *Guidance Document to the Import Health Standard for Cats and Dogs* and the draft *Risk Management Proposal: Cats and Dogs*. Animal Biosecurity and the Australian Quarantine and Inspection Service (AQIS) have reviewed the documents and would like to make the following comments.

- New Zealand proposes that all dogs and cats entering New Zealand, other than from Australia, will require a post-arrival quarantine period (PAQ) of 10 days, and that PAQ is no longer included as a risk management for rabies. Australia is currently undertaking a review of rabies in relation to dog and cat imports, which will consider the length of post-arrival quarantine including that required to minimise the introduction of contagious exotic diseases and external parasites. The review will also consider dogs and cats that have been imported into New Zealand and period of residency in New Zealand before export to Australia.
- New Zealand proposes removal of the requirement for testing dogs for *Ehrlichia canis* prior to Importation into New Zealand. In accordance with Australia's current requirements, dogs imported into New Zealand will require testing for *Ehrlichia canis* before export to Australia. Mechanisms will need to be in place to ensure that all dogs imported into New Zealand are identified and can be recognised as previously imported before to Australia.
- We request confirmation that New Zealand has approved the PCR test for *Babesia Gibsoni* developed by Dr. Peter Irwin at Murdoch University, for dogs being exported from Australia to New Zealand.

The comments above reflect previous discussions with New Zealand (letter to Rachelle Linwood, 23 April 2010)

Australia makes the following general comment:

Prohibited breeds

Australia has added the *Presa canario* breed to the list of prohibited imports.

Comments specific to Model Veterinary Certificates within the Guidance Document are as follows:

Model Veterinary Certificate A for cats and dogs from Australia

- *Heartworm treatment for dogs*

Australia suggests that the treatment options 'a.', 'b.' and 'c.' on page 4 are listed as alternatives to option 'd.', consistent with the heartworm treatment options on page 10 or page 16.

- *Examination within 24 hours of export*

The examination by a registered veterinarian and certification by the Official Veterinarian within 24 hours of export may be operationally difficult. Australia requests that the final pre-export check be within 48 hours before export.

Model Veterinary Certificate B for cats and dogs from Australia

Australia requests the wording for certification re absence of *L. interrogans* serovar *canicola* be changes to:

"To my knowledge, in the 12 months prior to export there have been no cases of the following diseases ~~diagnosed~~ **reported** in Australia:

b. **Canine** Leptospirosis caused by *Leptospira interrogans* serovar *canicola*

Model Veterinary Certificate B for cats and dogs from countries or territories recognised as rabies free

Declaration of rabies freedom

A declaration of country freedom from rabies is not included. For consistency with the declaration required for dogs imported from Australia, Australia suggests a declaration of rabies freedom be included in the Veterinary Certificate B.

Model Veterinary Certificate A for cats and dogs from countries where rabies is absent or well controlled

Testing for Babesia canis for dogs from South Africa

New Zealand will require treatment or testing of dogs for *B. canis* before importation. Australia currently requires any dog that has ever been resident in Africa to be treated for *B. canis rossi* with imidocarb dipropionate before importation into Australia. This could result in a dog tested with a negative result before entry into New Zealand requiring treatment with imidocarb dipropionate before subsequent export to Australia. Australia is currently reviewing import conditions for piroplasmiasis and will consider the option of testing for *B. canis rossi* as an alternative risk management measure to treatment

Import condition for Babesia canis

The requirement for testing or treatments of dogs for *B. canis* appears to apply only to dogs from South Africa, specified in the *Model Veterinary Certificate A for cats and dogs from specified countries where rabies is absent or well controlled*.

Could New Zealand please clarify whether the requirement for testing or treatment of dogs before export for *Babesia canis* refers only to *B. canis rossi* or does this requirement apply only to dogs exported directly from South Africa; or does it include dogs imported from South Africa into a third country and subsequently exported to New Zealand?

Animal Biosecurity and AQIS value the ongoing co-operation between New Zealand and Australia in harmonising dog and cat import conditions.

Yours sincerely

Robyn Martin, General Manager, Animal Biosecurity, Biosecurity Australia.
