

REVIEW OF SUBMISSIONS ON:

**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION
INTO NEW ZEALAND OF ORNAMENTAL FISH AND MARINE
INVERTEBRATES**

Ministry of Agriculture and Forestry
Wellington
New Zealand

31 March 2011

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Imports and Exports Directorate
Ministry of Agriculture and Forestry New Zealand

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**DRAFT IMPORT HEALTH STANDARD FOR THE IMPORTATION
INTO NEW ZEALAND OF ORNAMENTAL FISH AND MARINE
INVERTEBRATES**

31 MARCH 2011

Approved for general release

Matthew Stone
Animal Export/Import Group Manager
MAF

Executive Summary

A draft Import Health Standard for Ornamental Fish and Marine Invertebrates went out for consultation on 15 November 2010. This draft was based on 2005 and 2009 Risk Analysis documents and submissions to these risk documents. Seven written submissions were received to the draft Import Health Standard for Ornamental Fish and Marine Invertebrates, and views were also expressed in emails, phone conversations and meetings with facility operators. These submissions have resulted in some changes to the proposed standard, where these changes made operational sense without compromising biosecurity.

The possibility of doing pre export quarantine (source population testing and verifiable certification) if the facilities and procedures become available in the future was included in the draft standard. There was a unanimous request from the facility operators to have this removed as there is still too much uncertainty about what would be involved.

There was general agreement among facility operators that disposal of fish and packaging in the draft standard was difficult to understand. This has been revised in the proposed standard to reflect that normal (not MAF-approved) disposal methods can be used or packaging can be re-used at the end of quarantine if there has been no disease investigation.

Submissions agreed that the removal of the seal at the facility by the supervisor, and checking of every fish as they are unpacked against documentation was too prescriptive. This has been changed to a more outcome-based statement that will ensure biosecurity is met, but that the supervisors have more discretion when fish are unpacked.

‘At the transitional facility the supervisor shall be satisfied that the species and number (or approximate number where appropriate) of ornamental fish and marine invertebrates within the consignment are as recorded on the accompanying documentation.’

Inconsistency in classification of *Poecilia* species was highlighted. *Poecilia latipinna* has been reclassified as a tropical fish.

It was also highlighted that some fish and marine invertebrates on the original list that was collated by MAF had still not been considered for approval. After agreement from ERMA, these species were put through risk analysis and added to the approved list on the proposed IHS:

Lysmata wurdemanni

Linckia laevifata

Astraea tecta

Diadema setosum

Myacedium elephantosus, *M.mancaoi*, *M. robokaki*, *M. steeni*, *M. umbra*

Rumpella spp

Plectranthias inermis

Agamyxis pectinifrons

Dimidiochromis compressiceps

Hypoptopoma gulare

Mesonauta festivus

From now on, any new fish or marine invertebrate species will require assessment by ERMA before being eligible for importation.

Introduction

The draft import health standard for the importation into New Zealand of ornamental fish and marine invertebrates from all countries was notified for consultation on 15 November 2010.

MAF received submissions from the following:

From		Date received
1. Warren Garrett	Brooklands	09/02/2011
2. Richard Woolley	Highway Fish	11/01/2011
3. David Jenkins	Auckland University	22/11/2010
4. David Deyermond	Hollywood Fish farm	19/11/2010
5. John Seccombe	Aquahort Ltd	16/11/2010
6. Chris Houston	Beef and Lamb NZ	16/11/2010
7. Michael Tan		25/02/2011

This document reviews each submission in turn. The full text of each submission is included in Appendix 1.

Submissions

1 Warren Garrett, Brooklands

1.1 The submitter is concerned that the proposed permit application includes details of source population testing and verifiable certification. The submitter feels that the permit is not a suitable place to include this.

MAF response:

The intent was that the IHS was 'future proofed' for developments in overseas testing and facilities. MAF agrees that if this is approved in the future, this can be dealt with outside the permit, so this clause has been removed.

1.2 The submitter had concerns about proposed changes to disposal of packaging.

MAF response:

The proposed changes to packaging disposal were intended to give more options but caused some confusion to operators. This has now been explained better in the IHS, to allow MAF-approved disposal before the end of quarantine, or normal disposal or re-use after quarantine if there has been no disease investigation.

1.3 The submitter questions why *Poecilia latipinna* has been classified as subtropical, when other *Poecilia* are tropical.

MAF response:

Poecilia latipinna has been reclassified as tropical in the IHS.

2 Richard Woolley, Highway Fisheries

2.1 The submitter questions the definition of batch test and source population test.

MAF response:

MAF notes the comments about batch testing, and that the inability to be more specific with numbers of fish that may be tested is concerning for the operators. However, as the IHS does state, each disease investigation is different and the numbers of fish must be determined on an individual basis.

Source population testing is an untried option, but the definition will remain in the IHS because it is included in the risk mitigation options.

2.2 The submitter is concerned that the proposed permit application now includes details of source population testing and verifiable certification. The submitter feels that the permit is not a suitable place to include this.

MAF response:

See reply to 1.1

2.3 The submitter questions the requirement that high-risk species on the documentation is highlighted.

MAF response:

Comments noted. The requirement for this highlighting is now within 7 days of the consignment arriving.

2.4 The submitter had concerns about proposed changes to disposal of packaging.

MAF response:

See reply to 1.1

3 David Jenkins, Containment and Hazards Manager, Auckland University

3.1 The submitter, on behalf of Auckland University staff, welcomes the reduced quarantine period for *Danio rerio*. The submitter also welcomes the ability for multiple shipments on a permit.

MAF response:

The ability to import multiple consignments on a permit is not a change. Thank you for the correspondence.

4 David Deyermond, Hollywood Fish Farm

4.1 The submitter states the time for consultation was not long enough, and that it appears MAF wants to rush the process.

MAF response:

The time for consultation was extended for anyone that had corresponded with MAF or made a submission, as it was recognised that the holiday period is a busy time. The operators were given till mid-March, and this included ongoing correspondence with MAF in an attempt for all concerns to be addressed where possible.

4.2 The submitter states the proposed changes will have far-reaching implications, and the intended approach will do more damage to the hobby than good, one result being that fish prices may rise.

MAF response:

The submitter has not specified any particular part of the IHS that they are concerned about, so a direct answer cannot be given.

The IHS and TF standard are concerned with biosecurity, not with ensuring that the fish hobby is affordable. Where possible, the proposed standards have been changed based on consultation with the facility operators, where these changes do not compromise biosecurity.

5 John Seccombe, Aquahort Ltd

5.1 The submitter states MAF has not established the risk that the imported fish species present to New Zealand, but is 'merely establishing a difference from New Zealand native species'. The submitter also suggests MAF should consider whether the imported species can survive in New Zealand.

MAF response:

MAF refers the submitter to the 2005 and 2009 Risk Analysis on Ornamental Fish and Marine Invertebrates. These documents considered the fish and marine invertebrate species that were submitted to MAF as being previously imported to New Zealand, and assessed the diseases they could potentially carry. DoC/NIWA considered the submitted species, and whether they were potentially invasive. The submitter did not make a submission to these risk documents.

5.2 The submitter seems to be questioning the allowable species list.

MAF response:

The list and any amendments that arise from this IHS amendment process are as a result of HSNO requirements, and consultation between MAF, ERMA and DoC. Many

low risk species were added to the allowable species list after going through this risk process, and more high risk species have been added to the proposed draft.

6 Chris Houston, Beef and Lamb

MAF thanks Beef and Lamb NZ for notifying that they will not be making a submission.

7 Michael Tan

7.1 The submitter states that it would not be hard to obtain accurate import volumes for fish species.

MAF response:

Noted.

7.2 The submitter states that the requirements for coral to be cultured on clean bases will potentially kill the coral trade as many corals are taken from the wild, and operators do not have the skill to transfer them onto clean bases. The submitter suggests alternative risk mitigation measures.

MAF response:

Noted.

7.3 The submitter approves of the option for offshore quarantine, but suggests some points need to be clarified.

MAF response:

The proposed import health standard does include the possibility of offshore quarantine, but this would require a lot of verifiable certification, and possibly audits. The details of this have not been considered at this point.

7.4 The submitter says that there are fish and marine invertebrates that were agreed to by MAF that are not included in the draft IHS.

MAF response:

The facility operators presented a small list of fish species that are not present on the proposed IHS, but were on a list collated by MAF of fish/marine species present in New Zealand before 1998. MAF and ERMA agreed that this small list go through the risk analysis process, and they are now added to the proposed standard. From now on, any new species will require assessment by ERMA before being eligible for importation.

APPENDIX 1

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1. Import Health Standard for Ornamental Fish and Marine Invertebrates

6.2 Permit to import

The permit application must include details of the source population testing or verifiable certification where it is intended these options will be used to meet risk mitigation measures (see Appendix 1). These options require pre-approval by MAF.

- The permit to import is renewed annually and is valid for multiple consignments. To include details of the source population testing in the permit application would not be viable, as it would not allow for any variation whatsoever of testing facilities or overseas suppliers. If an importer is to utilize source population as a mitigation option, this should be submitted to the Supervisor for approval by MAF, not a requirement under the Permit to Import.

10. Quarantine in New Zealand

10.8 All plastic bags and other packaging in direct contact with the fish or transport water and any solid waste (such as dead fish and fish waste) must be collected, double-bagged, and held for inspection by the supervisor. Disposal will follow biosecurity clearance at the end of the quarantine period. Where an exotic disease has been identified, or the operator has chosen euthanasia of fish instead of a disease investigation, disposal must be by a process approved by MAF, such as autoclaving, incineration or steam sterilisation. The operator of the transitional facility must maintain records of disposal of material associated with disease investigations, which may be audited by MAF.

- The disposal of plastic bags and other waste material needs to be treated as a separate issue to dead fish disposal.
- Dead fish need to be kept chilled or frozen and held for inspection by the Supervisor. However plastic bags and other packaging material should be disposed of as soon as possible after arrival using a process approved MAF. We do not have the space to hold packaging within the quarantine area until the end of the quarantine period for disposal and can see no reason for this requirement.
- The method that we are currently using for disposal of plastic bags and waste materials as approved by our Supervisor is deep burial in a MAF approved site. The reason for this is that the other disposal methods are not a viable option in our region. We would like to see deep burial in a MAF approved site included as a disposal option.

10.10 Packaging not in direct contact with the fish or transport water (eg cardboard boxes and polystyrene bins) may be released at any time if treated as per the Approved Biosecurity Treatments for Risk Goods Directed for Treatment: <http://www.biosecurity.govt.nz/border/transitional-facilities/bnz-std-abtr>

- The only packaging which might be "recycled" by the Operator are the inner polystyrene box and outer cardboard box used for shipping. Neither of these containers is in direct contact with the fish or water during shipping, therefore they do not pose the same biosecurity risk as the plastic bags in which the fish are transported. If the polystyrene boxes and cardboard outer boxes are clean and dry then treatment should not be required, as is the case with any other imported commodity.
- If a bag fails and leaks within the shipping box then it should be treated as contaminated and the cardboard box and packaging should then be destroyed.
- We have searched the Approved Biosecurity Treatments for Risk Goods and have not been able to find anything referring to treatment of these packaging materials. We would like to see a specific clause included in the standard so all parties are clear on the handling of packaging.

Part D: Appendix 1

High Risk Species of Ornamental fish and Marine Invertebrates

- We would like to question why *Poecilia latipinna* has been classified as *subtropical* when all other species of molly are classed as tropical. Based on the temperature ranges given on the Fishbase website, *Poecilia latipinna* is found in a warmer temperature range than *Poecilia sphenops*. We would like to suggest that all the *Poecilia* species are listed as *tropical* in the interest of keeping matters as simple as possible for all parties.

Poecilia latipinna 20°C - 28°C

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Poecilia sphenops 18°C - 28°C
Poecilia velifera 25°C - 28°C

2. Richard Woolley
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RE: Ornamental Fish and Marine Invertebrate Import Health Standard submission

**IMPORT HEALTH STANDARD FOR ORNAMENTAL
FISH AND MARINE INVERTEBRATES FROM ALL
COUNTRIES**

*Issued pursuant to Section 22 of the Biosecurity Act 1993
Dated: 1 November 2010*

3. DEFINITIONS

Batch test

A representative number of fish (as determined by the supervisor and MAF) tested to show that the batch of fish is free from a specified disease of concern.

Note: The number of fish required for a batch test will vary with such factors as the species of fish, number of fish in the batch and the disease agent being investigated, and will be determined by MAF on a case basis.

· Perhaps a guidance document could be provided outlining numbers required for each test so that accurate cost analyses may be performed as importation of particular high risk species may no longer be a viable option. Current test costs could also be included.

Source population test

A representative number of fish from the source fish population tested to show that the source population is free from a specified disease of concern. Any fish from the source population destined for export to New Zealand must not come into contact with other fish of a lower health status prior to or during exportation.

· At present, source population testing appears to be an untested option and its inclusion in this standard appears to be irrelevant at this stage. Please remove the option until SPT is deemed to be an acceptable method of restriction.
· Perhaps a timeline on the next update for this standard could be included as the standards need to be updated more regularly to keep abreast of new disease agents, new testing regimes and new species.

PART B. IMPORTATION PROCEDURE

5. PERMIT TO IMPORT

5.2 The permit application must include details of source population testing or verifiable certification where it is intended these options will be used to meet risk mitigation measures (see Appendix 1). These options require pre-approval by MAF.

· It is unacceptable to have this requirement as part of a permit application as permit applications are based on the operators resources and the compatibility of the facilities provided to maintain isolation during the observation period.
· As the source population testing is not yet a valid option, SPT results and verification should be a case by case option once SPT has been proven to be effective and submitted through the supervisor.

PART C: CLEARANCE PROCEDURE

10. QUARANTINE IN NEW ZEALAND

10.2 All high-risk ornamental fish and marine invertebrates on the documentation shall be highlighted.

· As part of the screening process, MQS and Supervisors are required to check the invoices for valid species at which time they can now check for risk species. Importers must supply original documentation (refer to clause 7.3) and these are

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supplied electronically. As high risk species have additional requirements to be met, operators will have processes in place to identify risk species and to meet all conditions prior to the release of quarantine. THIS information may be supplied within seven days of arrival of the shipment.

10.8 All plastic bags and other packaging in direct contact with the fish or transport water and any solid waste (such as dead fish and fish waste) must be collected, double-bagged, and held for inspection by the supervisor. Disposal will follow biosecurity clearance at the end of the quarantine period. Where an exotic disease has been identified, or the operator has chosen euthanasia of fish instead of a disease investigation, disposal must be by a process approved by MAF, such as autoclaving, incineration or steam sterilisation. The operator of the transitional facility must maintain records of disposal of material associated with disease investigations, which may be audited by MAF.

- THIS clause needs to be split as it deals with packaging and dead fish and they both have specific disposal and storage requirements.

- Dead fish need to be kept chilled or frozen for inspection.

- Plastic bags should be destroyed by incineration as soon as possible regardless of disease status and a method of treatment post arrival needs to be identified and adopted that will take into account any biohazard that may exist.

- If a destruction method (within a few days of arrival) is unavailable, clarification of where the plastic bags should be stored is required. In theory, the plastic bags should be kept isolated with the shipment, especially where the 'shared quarantine' option is used. THIS theory will not work as the facilities are designed to hold fish tanks only and no room has been provided for the storage plastic bags.

10.10 Packaging not in direct contact with the fish or transport water (e.g. cardboard boxes and polystyrene bins) may be released at any time if treated as per the Approved Biosecurity Treatments for Risk Goods Directed for Treatment:

<http://www.biosecurity.govt.nz/border/transitional-facilities/bnz-std-abtrt>.

- Please clarify where the cardboard boxes and polystyrene bins should be stored. In theory, they should be kept isolated with the shipment, especially where the 'shared quarantine' option is used. THIS theory will not work as the facilities are designed to hold fish tanks only and no room has been provided for the storage of packaging.

THIS may result in the need to designate alternative buildings / areas as transitional facilities for the storage of packaging.

Alternatively,

- Please specify exactly which clause of the standard (bnz-std-abtrt) is being referred to for:

- o cardboard boxes – unlisted and will not withstand a soaking treatment.

- o polystyrene bins - unlisted

- Treatments for cardboard boxes should be directed at wet boxes contaminated by imported water in direct contact with the fish. These boxes should be destroyed by incineration. As cardboard boxes can get wet during transit to or from the aircraft, the source of contamination must first be ascertained.

- Plastic box liners are now a common inclusion in arriving shipments and prevent polystyrene bins from becoming wet. The box liners are destroyed with the plastic bags.

- Packaging that requires additional treatment should be identified by the operator in association with the supervisor during the unpacking of a shipment.

- Please identify the risk from cardboard boxes and polystyrene bins that have not come into contact with shipping water i.e. the dry boxes.

3. David Jenkins

Hazards and Containment Manager

Auckland University

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As MAF may appreciate the University of Auckland imports *Danio rerio* as a model organism for a number of studies. These imports come from highly controlled laboratory environments where water quality and fish health is monitored and very tightly controlled.

Notwithstanding the University of Auckland has very specialist imports of zebrafish, those involved in importation and husbandry of zebrafish have had an opportunity to comment on the standard and we note 2 positive developments in the formulation of the new standard as it affects the University of Auckland zebrafish facilities.

1. Zebrafish are classified as lower risk and the quarantine period has been reduced from 6 to 4 weeks. We fully support this the reduction in quarantine period as a consequence of the lower risk rating.

2. The draft import health standard allows permits for multiple shipments (presumably at the discretion of MAF Animal Imports). Given that the University zebrafish facilities will be importing zebrafish into containment from highly controlled overseas laboratory aquaria, we fully support allowance for discretion to issue multiple permits.

I trust that these comments will be helpful for MAF/NZ Biosecurity

Regards
David Jenkins

4. David Deyermond
Hollywood Fish Farm
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Our primary income is selling aquarium fish. We do not import the livestock ourselves but have very good relationships with those that do. We feel the proposed changes will have a negative effect for the whole pet industry in New Zealand.

We have read over the Risk Management Proposal document.

<http://www.biosecurity.govt.nz/files/biosec/consult/rmp-fisornic.all-15-11-2010.pdf>

The implications of such a proposal would be far reaching and its intended approach may do even more damage to the hobby than good. We understand the need to quarantine and what its designed to prevent.

We feel that the length of time in order to submit a response is not long enough. THIS should be extended to March 31 2011 where the pressures of the festive/holiday season are over and done with. Those wishing to comment have lives outside of importing fish. It feels like this document is being rushed through preventing interested parties a decent chance to digest all the information and submit comments.

The immediate thing that springs to mind is that 2 things will happen.

Firstly the price of all imported stock will go up - deterring more people from entering the hobby. If that is not bad enough with an industry already struggling - the availability of harder to source or rarer fish will cease. The knock on effect means only common "bread and butter" species being available. Once people get bored of those they will leave the hobby. Importers will not import risky fish if testing of their numbers means soaring prices for the end consumer. If the selection is restricted then the temptation to smuggle these rare fish into the country becomes stronger. We have seen this happened in the past. Then the spread of disease organisms becomes a higher risk and a break down of the whole quarantine system...

Many aspects of the pet industry are struggling and being at the end where you deal with the public everyday we notice what people buy and how they spend their money. People are already thinking twice about certain purchases and more restrictions and higher prices would jeopardize the aquatic industry even more.

If you would like to speak to me regarding anything relating to this please do not hesitate to contact me.

Regards
David Deyermond
Owner of Hollywood Fish Farm
Mt Roskill
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Thanks HFF Roskill :)

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5. John Seccombe
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Who was the persons who actual rewrote this draft.

Who amended it?

It looks to me the MAF has not established the actual risk management damage that any of the enclosed species presents to the New Zealand, environment, eco system, economic structure or cultural environment.

MAF is merely establishing a difference from the norm (NZ native species) and charging to monitor that difference.

A few years ago if it/species was not on the list of endangered species, or a high risk to NZ environment if said species could not survive, then MAF had no interest in it.

I travel the world consulting, and to quote 3 years ago in Wales, where I established a export fishing company of live seafood.

The UK DFRA (Biosecurity department of the UK) informed me, that they could not issue health certificates, or have any interest legal or other wise in my live Crustaceans (Crabs/Lobster) as there has been " No notifiable diseases from these species"

Now this department oversees all the regulations governing the movement of live animals or fish around Great Britain, and into the EU.

So why not establish the risk in these species?

Will it survive and bred in the NZ natural environment?

Why is it MAF sees fit to rewrite the laws, that make it more complicated for compliance and more expensive?

How about establishing the risk/cost /damage in the first instance.

Regards ><{{{(*>
John Seccombe

6. Chris Houston
Senior Advisor - Technical Policy beef + lamb New Zealand
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Just letting you know that we do not intend to prepare a submission on the Import Health Standard for Ornamental Fish and Marine Invertebrates.

Best wishes,
Chris

7. Michael Tan
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RE: Submission on documents relating to the import of ornamental fish and marine invertebrates.

I am writing to voice my views formally relating to the import of ornamental fish and marine invertebrates, from all countries. Please see below for section specific opinions.

16.3 of 2009 Review of Submissions

"In general, it is hard, if not impossible, to obtain accurate import volumes for the different

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species."

As I have stated in an earlier submission, I disagree. According to an Official Information Act response dated 13th May 2008, MAF gave specific numbers of imported fish and consignments for 2006 and 2007.

Considering the numbers provided are very specific, it should be relatively easy for MAF to obtain with relative ease the number per species imported.

10.7 of the 2010 Draft IHS

"Coral must be live on arrival in New Zealand. Viability will be assessed by activity of the polyps being apparent. All corals must be cultured on clean bases. All visible contamination by animals and plants and other material must be removed from the live coral on arrival at the transitional facility. The live coral must be held in suitable growing conditions to allow any pest species to grow to a visible size during the quarantine period. Live corals must be free of any visible hitchhiker organisms before they are given biosecurity clearance."

I see this as potentially killing the coral trade in New Zealand. Many corals are harvested from the wild and many exporters do not have the skill and/or time to transplant them onto a clean base. Cultured corals are very difficult to obtain and a fairly expensive due to the increased time and materials required for culturing. Furthermore, corals which are considered large-polyped stony are near impossible to culture or fragment onto cultured bases.

I personally suggest allowing the importer to bring in corals attached to rock. Have the importer and/or supervisor visually inspect each rock briefly for hitchhiker organisms. The importer should then be required to visually inspect the tanks and rock for hitchhiker organisms throughout the three week quarantine period and record and destroy any which are found.

10.15 of the 2010 Draft IHS

"Where offshore quarantine is pre-approved by MAF, or compartment, zone or country freedom from the 19 hazards is demonstrated by acceptable zoosanitary certification and pre-approved by MAF, post arrival quarantine may not be required."

I think that this is a fantastic step by MAF. It has the potential to exponentially decrease retail costs for hobbyists. However, I do think that MAF may need to clarify some points.

1. If an importer gained approval to waive post-arrival quarantine from a specific supplier, would this approval be indefinite or solely for that one import?
2. If it was indefinite, would other importers also be able to import from that particular exporter without the need for post-arrival quarantine?
3. Would there be a cost to importers to obtain this approval?

Appendix 2 of the 2010 Draft IHS

There are several marine invertebrate species (possibly some fish species as well), which, according to my records are not included on the IHS.

On the 13th May 2008, I received a response to an Official Information Act request from Richard Fraser of Animal Imports at MAF. He stated that the following invertebrate species were to be added:

Cypraea IHStrio

Dardanus gemmatus

Enoplometopus occidentalis

Hippopus hippopus

Linkia laevifata

Loimia medusa

Lysmata grabhami

Lysmata wurdemanni

Nassarius

Ophiomastix sp.

Rhynchocinetes uritai

Sabellastrarta indica

Saron sp.

Spirographis spallanzanii

Trochus

Those which are in **bold** above are not on the 2010 draft IHS. Can MAF clarify their status. There was another electronic document from MAF which stated that MAF recognised that *L. wurdemanni* and *L. laevifata* were accidentally left off the draft IHS and would be added. However, due to a computer error, I have lost this document. Further comments by MAF state that only organisms identified at species level can be added,

however, there are some species on the current and draft IHS that are still at genus level.

Additional notes:

Currently, the process to add new species onto the IHS is arduous. At present, people wishing to add new species have to go through two layers of government approval - the first being ERMA and the second being MAF. Is there anyway that MAF and ERMA can come together so that hobbyists, importers and other stakeholder can add a large number of new species onto this draft IHS.

According to the ERMA webpage, getting approval is relatively straightforward if the genus has already been risk assessed. It seems ridiculous that, for example, we can import six out of the seven species in the genus *Zebrasoma sp.* whilst the seventh is not approved. Another example is we can currently import three out of the five *Gramma sp.* whilst the other two are not approved.

If us stakeholders know that a species is new by definition, then wouldn't it be easy to add that species onto the draft IHS, considering that its genus is already risk assessed?

Kind regards,

Michael Tan
