

REVIEW OF SUBMISSIONS ON:

DRAFT STANDARD FOR TRANSITIONAL FACILITIES FOR ORNAMENTAL FISH AND MARINE
INVERTEBRATES

Ministry of Agriculture and Forestry
Wellington
New Zealand

31 MARCH 2011

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Ministry of Agriculture and Forestry New Zealand

**DRAFT STANDARD FOR TRANSITIONAL FACILITIES FOR ORNAMENTAL FISH AND MARINE
INVERTEBRATES**

31 March 2011

Approved for general release

Matthew Stone
Animal Export/Import Group Manager
MAF New Zealand

Contents

A draft Import Health Standard for Ornamental Fish and Marine Invertebrates went out for consultation on 15 November 2010, based on 2005 and 2009 Risk Analysis and submissions to these risk documents. The draft standard required that changes be made to the standard Transitional Facilities for Ornamental Fish and Marine Invertebrates so the proposed IHS could be implemented. The draft transitional facilities standard went out for consultation on 28 February 2011.

Three submissions were received on the draft transitional facility standard. However, other submissions were received informally at a meeting held with MAF and the facility operators, and via phone and email. Many of the concerns of the operators, especially related to operational issues, were worked through, and the proposed standard has been updated to reflect these changes where they do not adversely affect biosecurity.

Submissions were unanimously unhappy with the requirement for daily reporting on water parameters, fish signs of illness and mortality. MAF maintains the position that disease reporting is important, and that it is the supervisor and not the operator who will decide when the information reported will trigger a disease investigation. However, MAF reduced some reporting measures, rewording them to be less prescriptive. The need to record daily water parameters has been removed, but these records may be required as evidence that a disease investigation is not required. The need to report unusual fish mortality remains, but the specific time frame has been removed, with the understanding that late reporting may result in a delay in any required investigation, or delay in the clearance of fish.

The proposed changes may mean increased disease testing, and in the current facilities this could result in the need for testing or euthanasia of all fish in the consignment, and for closing and cleaning of the entire facility. Agreement was made to allow systems to be put in place (details of how the operator will meet these will be included in the manuals) for 'direct water systems' that isolate groups of fish for the purposes of disease isolation for fish testing, euthanasia and facility cleaning. These definitions have also been added to the proposed standard.

Changes were also made in the proposed standard in the clauses on Shared Quarantine. These now describe the measures the operator must put in place to have fish not in the same direct water system.

Changes were made to when visits by the supervisor are made during the quarantine period, and more outcome-based statements are used for the supervisor's roles so that these are achievable and practical, and meet biosecurity requirements.

Introduction

The draft standard Transitional Facilities for Ornamental Fish and Marine Invertebrates was notified for consultation on 28 February 2011.

Name		Date received
1. Warren Garrett	Brooklands	10/02/2011
2. Richard Woolley	Highway Fisheries	07/02/2011
3. Alois Wolloner	Aquanet	21/2/2011

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

The full text of each submission is included in Appendix 1.

Submissions

1. Warren Garrett – Brooklands

- 1.1. The submitter highlights the difficulties caused by tank lids for operators, and suggests these be made optional

MAF comment:

MAF has discussed this with the operators, and has made tank lids optional. Tank lids will be required when tanks are within splash distance for the tanks to be considered as a different direct water system.

- 1.2. The submitter disagrees that laundering of clothes between shipments is necessary, as covered in the Access to the Transitional Facility section.

MAF comment:

MAF agrees that laundering of clothes is covered in the Exotic Disease section, and has removed it from the Access to the Transitional Facility section.

- 1.3. The submitter points out that marine and freshwater fish should be able to share quarantine facilities as pathogens cannot be passed between them.

MAF comment:

MAF has agreed to extend the Shared Quarantine section, by introducing the concept of separate direct water systems. However, marine and freshwater fish must be kept in separate direct water systems (in terms of equipment, handling and water transfer through splashing etc) for the fish to be considered in a different batch for the purposes of disease investigation or biosecurity clearance, as they do have pathogens that may potentially transfer between them.

- 1.4. The submitter has many concerns with the Disease Surveillance and Treatment section. Recording water conditions (pH, dissolved oxygen, nitrogenous waste etc) is too prescriptive – the tests that are performed depend on the circumstances, and should be at the operators discretion. The submitter considers that 25% of fish dying needs to be considered in context, and that having to report immediately is often not necessary.

MAF comment:

MAF has discussed this at length with the operators since the draft standard and this submission were written. MAF has agreed that recording water parameters can be not mandatory, but has made it clear that this information may be useful in a disease investigation as proof that mortality is not caused by an exotic disease.

MAF has agreed to remove the requirement to report all fish illness.

MAF has also removed the need to report mortality immediately – but again has made it clear that a delay to report fish mortality may result in delaying a disease investigation, or biosecurity clearance of fish.

MAF defends the need to report a percentage of mortality in low risk fish and 25% was chosen. This may not result in action other than the supervisor checking and monitoring the situation, but this is the supervisor's decision to make.

MAF also defends the requirement to report all unusual mortality in high risk species – this has been changed from just 'all mortality', which implied every death. Again, the supervisor will then look at the situation and evidence supplied by the operator to decide if further investigation is needed.

- 1.5. The submitter suggests the prophylactic treatments that have been approved by MAF be included in the standard.

MAF comment:

MAF has added all approved prophylactic treatments into the standard, including new ones requested by the operators that have now been risk assessed.

- 1.6. The submitter has some concerns from the section Minimum Requirements for Inspection. These include ambiguity about the number of visits required for freshwater and marine fish. The submitter says the number and timing of visits is confusing. They also state that checking fish and verifying numbers as the fish are removed from the containers is too onerous, delays unpacking, and does not allow discretion for the supervisor to manage the system.

MAF comment:

Since the draft standard went out for consultation, and this submission was written, these issues have all been worked through with the operators. The wording has been changed so that it is now clear that 3 supervisor visits are required for freshwater fish, and 2 visits for marine fish. Wording around unpacking and checking numbers of fish have been changed so that biosecurity is still met, but there is flexibility for the supervisor to use a system that works for them and the facility.

2. Richard Woolley – Highway Fisheries

- 2.1. The submitter requests that the use of tank lids should not be compulsory.

MAF comment:

See answer to 1.1.

- 2.2. The submitter asks that MAF removes the statement: *This neutralisation process is for guidance only. MAF will not be held responsible for any cost or action resulting from the discharge of inadequately neutralised wastewater into foul water treatment systems.*

MAF comment:

This statement has been removed from the standard.

- 2.3. UV treatment of water must be on water that is clear (filtered), with a UV dose treatment of 130mW/cm². The submitter suggests using a transmittance rate of 85%, used for NZ drinking water, and questions why the rate is so high when 40mW/cm² is used for NZ drinking water.

MAF comment:

The UV dose and transmittance for NZ drinking water is for food safety, where as the filtration and dose of UV in the transitional facility standard has been calculated to kill the most resistant aquatic viruses.

Methods of determining the efficacy of the UV bulbs outside of following manufacturer recommendations are not specified in the standard, but can be submitted for assessment and approval included in individual manuals.

- 2.4. The submitter has many concerns about the Disease Surveillance and Treatment section in the draft standard, including wanting to know more about the clinical signs of the pathogens, information recorded about fish illness, how dead fish can be disposed of, and prophylactic treatments being in the standard.

MAF comment:

Most of these issues have been discussed and resolved with the operators since the draft standard and this submission were written.

Prophylactic treatments: see answer to 1.5

Disposal of dead fish: this wording has been expanded in the standard.

Clinical signs: this is for the supervisor and not operator to decide, so anything unusual should be reported. However, it is appreciated that knowledge may be useful for both supervisors and operators, and a training day with the risk team will be scheduled for later this year.

Reporting of all fish illness; has been removed from the standard.

2.5. The submitter does not want exotic disease reporting in the contingency plan.

MAF comment:

MAF agrees, this has been removed.

2.6. The submitter makes suggestions about the Record Keeping section.

MAF comment:

Noted.

2.7. The submitter makes suggestions to clarify Minimum Requirements for Inspection.

MAF comment:

See answer to 1.6

3. Alois Wolloner, Aquanet

3.1. The submitter questions why the scope of the standard includes preventing non-allowed fish species into NZ, as this implies importers are dishonest, and is not included in other standards.

MAF comment:

Ornamental fish is a unique facility standard in that fish can be exported that are not allowed species, often unbeknownst to the importer. Aiming to prevent this does not imply that the importers are dishonest, but is an important function of the standard.

3.2. The submitter disagrees with the onerous requirements for reporting of dead and sick fish.

MAF comment:

See 1.4

3.3. The submitter disagrees with the triggers for a disease investigation, and says that the operator should not have to pay when the investigation is negative. The submitter feels there is no protection against vindictive supervisors.

MAF comment:

See 1.4 Supervisors are not vindictive, they are just doing their jobs in following requirements of the IHS and TF standard. The operator is responsible for any costs of disease investigation.

3.4. The submitter disagrees with having to separate fish in a disease investigation, and says facility design means it is not possible to have all fish separate. The submitter questions why fish cannot be released until the disease investigation is concluded.

MAF comment:

See 1.3 and 1.4 The concept of separating water systems has given a lot more flexibility to separation and housing of fish so all the shipment is not part of a disease investigation. These systems need to be approved by MAF/the supervisor.

3.5. The submitter questions the mandatory use of tank lids.

MAF comment:

See 1.1

3.6. The submitter questions why all fish must be checked on arrival.

MAF comment:

The need for the supervisor to remove the seal, although this will still be the norm, has been removed from the standard to give the supervisor flexibility. There is also more flexibility for how the supervisor checks the fish – the following is from the proposed IHS:

“At the transitional facility the supervisor shall be satisfied that the species and approximate numbers of ornamental fish and marine invertebrates within the consignment are as recorded on the accompanying documentation. In cases where identification of fish or marine invertebrates is in doubt the supervisor may seek advice from MAF, and the operator of the transitional facility must provide proof of identity.”

3.7. The submitter questions the section ‘at every visit the supervisor shall’, which seems like a full audit of the facility.

MAF comment:

This list has been removed and replaced by a more outcome-based statement that the supervisor is satisfied that the operator and facility continue to meet the requirements of the standard.

APENDIX 1

Warren Garrett
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New Zealand

1. Transitional Facilities for Ornamental Fish and Marine Invertebrates

6.2 Structural requirements

Tanks must be fitted with lids (or approved equivalent) to prevent fish jumping out of the tanks and to minimise splash contamination.

- Lids can have a negative effect as they restrict oxygen exchange and heat transfer from the surface of the aquarium. Also in regard to live corals, which require intense lighting to survive, a glass lid will restrict light which is detrimental to the health of the coral. Another reason that we do not have full lids is for the ease of cleaning, feeding and inspection of each tank. We fit glass strips to the top edge of our aquariums covering 25% of the water surface in order to minimise splash contamination and the risk of fish jumping out. We have found this to be a very effective system (other importers may have different systems) We have a staff member frequently monitoring each tank to make sure that there are no signs of stress or disease, or other unusual occurrences such as fish jumping out of the tanks. As we are a commercial operator it would not be in our best interests to have fish mortalities due to fish escaping from their tanks onto the floor.
- Suggestion: Tanks may be fitted with lids to prevent species which jump from jumping out of the tanks and to minimise splash contamination.

6.4 Access to the transitional facility

6.4.5 *The operator shall provide protective clothing and footwear for staff and visitors to use in the facility, to prevent contamination of street clothes and footwear. This shall remain in the facility, be washed between shipments, and always be kept separate from street clothes. Disposable overshoes may be used provided they are destroyed after use*

- Laundering of clothing is also covered in 6.8.3. We agree that regular cleaning is essential but this should be included in the operation manual and internal auditing procedure. It is the Operator's responsibility to ensure a laundering program is in place and the frequency of this cleaning should not need to be outlined in the standard.

6.5 Shared quarantine

6.5.1 *Each import shipment of ornamental fish and marine invertebrates shall be physically isolated from each other, preferably in separate rooms.*

- This statement is ambiguous as it implies that ornamental fish should be kept in separate rooms to marine invertebrates. This is not the intention of this statement and as it is already clear that the standard applies to ornamental fish and marine invertebrates this statement should be simplified.
- Suggestion: Each import shipment shall be physically isolated from each other, preferably in separate rooms.

6.5.3 *If shipments of ornamental fish and marine invertebrates with different quarantine periods are held in the same room then the following additional requirements shall be met:*

"Each shipment shall be held in a discrete group of tanks physically separated from tanks holding fish of another shipment. The separation distance shall be sufficient to prevent the splashing of tank water from one group to another".

- In circumstances where freshwater fish are housed adjacent to saltwater fish, the risk of disease transfer from fresh to saltwater is nil, therefore there is no need for separation distance. Provision should be made in the standard to allow for this.

6.11 Disease surveillance and treatment

6.11.1 *The operator shall observe ornamental fish and marine invertebrates for signs of illness and abnormal behaviour periodically throughout the day. Records shall be kept by tank and species including at least: the number of fish dead and a brief description of any abnormalities on the cadavers; the number of fish showing signs of disease and a brief description of clinical signs; water quality parameters (dissolved oxygen, nitrogenous wastes etc) on a regular basis, and when there are deaths or clinical signs of disease in fish.*

- The word **and** needs to be removed from this sentence.
- There are a multitude of tests which the Operator can choose to conduct and each situation will call for different tests. The Operator will know from experience which tests apply to a particular situation. Specific tests such as dissolved oxygen or nitrogenous waste should not be mandatory but included in the Operator's internal procedures.

6.11.3 For species not considered high-risk, the operator must maintain records as detailed above and provide them to the supervisor at each visit and as requested. In addition, the operator must immediately notify the supervisor if more than 25% of the fish (by species or batch) suffers illness or mortality over a 96 hour period.

- In such circumstances factors such as the volume of fish need to be taken into account. If we have a batch of 20 fish with losses of 6 over a 96 hour period, there is most likely a reasonable explanation. However, if we have a batch of 3,000 and losses of 800 over a 96 hour period then there should be more reason for concern.
- This statement is too rigid and the Supervisor needs to be given some discretion. Perhaps the words "or approved by the Supervisor" should be added. Supervisors will not want us to call them on weekends or holidays on non-urgent matters – the word 'immediate' suggests that every mortality of 25% or more over 96 hours should be treated as high priority regardless of the circumstances?
- This section could cause compliance issues from both a Supervisor's and an Operator's perspective. It needs to be replaced with a more general statement giving the Supervisor the scope to do their job effectively at their own discretion.

6.11.4 For species considered to be high-risk, the operator must maintain records as detailed above and provide them to the supervisor at each visit and as requested. In addition, the operator must immediately notify the supervisor if fish display clinical signs of infection with pathogens listed in Appendix 1 of MAF Import Health Standard for Ornamental Fish and Marine Invertebrates or unexplained mortality. Where the operator claims that mortalities are linked to non-listed pathogens, or to environmental causes, evidence must be presented to the supervisor.

- Same as the previous statement, the word immediately may cause issues with compliance from both an Operator's and a Supervisor's perspective.

6.11.11 No medication of chemicals or drugs is to be administered to ornamental fish or marine invertebrates without the approval of the supervisor.

- There is a list of 11 approved compounds which MAF has assessed as suitable for routine use without unduly impacting on the efficacy of quarantine. These compounds should be listed as exemptions here.
- The Operator may apply to MAF for approval of other compounds used during quarantine as part of their treatment protocol, which must be renewed on an annual basis.

8.4 Supervision of a facility

8.4.1 Minimum requirements for inspection

For the initial facility approval and renewal of approval see sections 4.1.3 and 4.1.5 respectively.

The supervisor shall have a schedule for regular inspection of the facility and audit of operator's procedures. The supervisor shall make as many visits as considered necessary but the minimum number of visits is:

*for fresh water fish, three times during the quarantine period (on arrival, at about 13-16 days and prior to 4 weeks),
for marine fish and invertebrates, two visits (on arrival and prior to 3 weeks).*

- This wording could lead to misinterpretation re the number of visits. Is the visit "prior to 4 weeks" the release visit for freshwater fish or will another fourth visit be necessary at 28 days to arrange quarantine clearance?
 - for fresh water fish, three times during the quarantine period (on arrival, at about 13-16 days and a release visit prior to 4 weeks),
 - for marine fish and invertebrates, two visits (on arrival and a release visit prior to 3 weeks).

When a shipment arrives at the transitional facility the supervisor shall:

check the shipment for plants. Supervise their destruction by treatment with steam treatment or by incineration.

- the method that we are currently using for disposal of 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.
- Suggestion: check the shipment for plants. Supervise their destruction by treatment with steam treatment, by incineration or other approved methods (such as deep burial in a MAF approved site).

Correlate the invoice with the number (as close as possible) and species of ornamental fish and marine invertebrates as each bag is removed from the container.

- This wording is too specific and leaves no room for the Supervisor to manage their own check systems. To correlate these numbers as they come out of the box is not always a viable option when dealing with large shipments, especially when unpacking single bags containing marine fish. For example when we receive a

shipment of 30 cartons of mixed freshwater and saltwater species we might have as many as 1,000 individual bags.

The transfer of livestock to the tanks needs to be done as quickly as possible upon arrival. To check each individual bag against the invoice further adds to the traveling time. Any such delay in unpacking the fish jeopardizes the well-being of the fish, after an already long and stressful journey. The Supervisor can still effectively do their job by overseeing the unpacking and then correlating the invoice once the fish are released in the tanks. We would suggest that "as each bag is removed from the container" is removed.

- The Supervisor needs to have some discretion here as checking every fish against the invoice is extremely time consuming. If an Operator has a clean record without non-compliances then we would question whether a full audit of the invoice versus fish received is necessary for each import.

Verify the number of fish remaining from previous shipments if not in shared quarantine.

- This statement suggests that the Supervisor needs to audit the exact number of fish from previous shipments if not in shared quarantine. This would be an onerous task if taken literally.
- Suggestion: check that all fish remaining from previous shipments are separate from the new import if not in shared quarantine.

At every visit the supervisor shall:

match numbers of ornamental fish and marine invertebrate species in quarantine with supplier records.

- The Supervisor needs to have some discretion here as checking every fish against the invoice is extremely time consuming. If an Operator has a clean record without non-compliances then one would have to question whether a full audit of the invoice versus fish received is necessary for every visit.
- The last statement made, inspect quarantine records, actually covers this aspect, so we would suggest that the above statement is removed.

At about 28 days:

make arrangements for biosecurity clearance for fresh water ornamental fish when requirements of 8.4.6 are met.

- Should this be 26 days as for marines this step is taken at about 19 days?

Richard Woolley
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7th February 2011
Charlotte Richmond
Animal Imports
MAF
Ministry of Agriculture
PO Box 2526
Wellington
Dear Charlotte

RE: Transitional Facility Standard 154.02.06 submission

Thank you for the opportunity to make a submission on the Transitional Facility Standard 154.02.06.

The submission has been prepared by Richard Woolley, Director, Highway Fisheries Ltd who is contactable via the details below.

The submission covers the following areas of the Standard:

- 6.2 Structural requirements
 - 6.9.1 Chlorination of waste water
 - 6.9.2 Ultraviolet (UV) light irradiation
 - 6.11 Disease surveillance and treatment
 - 6.14 Contingency plans
 - 6.18 Records
 - 8.4.1 Minimum requirements for inspection
- If you require any further information, please contact the author.

Regards,
Richard Woolley

6.2 Structural requirements

Tanks must be fitted with lids (or approved equivalent) to prevent fish jumping out of the tanks and to minimise splash contamination.

While lids can be advantageous *for fish* in the initial days after arrival, removal of lids to Review of Submissions Draft Transitional Facilities for Ornamental Fish and Marine Invertebrates

facilitate heat transfer and enable the temperature to equalise is necessary as the fish require a stable environment to minimise stress. Perhaps strips around the top of the tank covering 'x %' of the surface area would suffice. Fish jumping from the tanks is an early indicator of a water quality problem or disease issue so is a useful tool in the observation process. Marine invertebrates require intensive lighting to survive. Condensation on the lids causes the light to refract and therefore misses the intended target. Anemones obviously need some form of containment. Splash contamination is irrelevant between tanks in the same shipment as the 'batch' definition – "Water systems will not be considered separate if there is contamination of water between tanks via equipment or practices" - disqualifies the statement.

Suggest a rephrase to "Tanks may be fitted with lids".

6.9.1 Chlorination of waste water

6.9.1.7 The chlorine in the wastewater may be neutralised by adding sodium thiosulphate at a rate of 1.25 grams (2.5 ml of 50% sodium thiosulphate solution) per litre of treated wastewater, then agitated for not less than 10 minutes before discharge.

Note: This neutralisation process is for guidance only. MAF will not be held responsible for any cost or action resulting from the discharge of inadequately neutralised wastewater into foul water treatment systems.

If MAF need to hide behind a disclaimer, then the comment should either be removed or investigated more thoroughly with regional councils to ensure it is an appropriate neutralisation process for inclusion in this standard. Please remove this statement.

6.9.2 Ultraviolet (UV) light irradiation

6.9.2.1 All water to be treated must pass through a filter capable of removing suspended organic material and, where necessary, other filtration to ensure that the UV transmittance of the water is within manufacturer's specifications prior to irradiation.

New Zealand drinking water standards specify a minimum transmittance of 85%. Perhaps this value could be adopted here as well.

6.9.2.2 Commercial UV water treatment units operating in the spectral range of 190-280 nm (254 nm recommended) delivering doses of at least 130 mWs/cm² are required. The dose is calculated as the product of the intensity (mW/cm²) and the exposure time in seconds (s). Servicing and maintenance must be done at least as frequently as required by the manufacturer of the UV sterilisation system.

- UV sterilisers typically deliver 30mW/cm² and the minimum dosage of UV in the New Zealand drinking water standards is 40mJ/cm² (40mW/cm²). Why is the dose set at 130mW/cm² and what are the target organisms?
- Has any thought been given to outcome based testing using aerobic plate count tests as a method of ensuring the UV is operating effectively? Monthly testing could commence from 11 months onwards to determine if the tubes are still effective & possibly extending the life of the tubes beyond 12 months? Perhaps a revision to this clause to include a testing option.
- UV sterilisers do not have to be commercial to work effectively. Design, dwell time & water clarity of the water are all critical factors. Suggest removing "commercial" from the statement.

6.11 Disease surveillance and treatment

6.11.1 The operator shall observe ornamental fish and marine invertebrates for signs of illness and abnormal behaviour periodically throughout the day. Records shall be kept by tank and species including at least:

Recording requirements belong in the "Records" section 6.18.

What allowance is going to be made for seasonal fluctuations in the fish health caused by temperature & water conditions - acid rain for example at the export source or will this issue be left to the discretion of the supervisor?

§ the number of fish dead and a brief description of any abnormalities on the cadavers;

This is could be expanded to include cause of death & any microscopy findings.

§ the number of fish showing signs of disease and a brief description of clinical signs;

This would be covered by the above alteration so could be removed.

§ water quality parameters (dissolved oxygen, nitrogenous wastes etc) on a regular basis, and when there are deaths or clinical signs of disease in fish.

This is not necessarily a regular requirement unless fish are dying without explanation as the filtration systems are designed to absorb nitrogenous wastes & oxygenate water. Please remove this requirement.

6.11.4 For species considered to be high-risk, the operator must maintain records as detailed above and provide them to the supervisor at each visit and as requested. In addition, the operator must immediately notify the supervisor if fish display clinical signs of infection with

pathogens listed in Appendix 1 of MAF Import Health Standard for Ornamental Fish and Marine Invertebrates or unexplained mortality. Where the operator claims that mortalities are linked to non-listed pathogens, or to environmental causes, evidence must be presented to the supervisor.

Clinical signs of the pathogens listed in Appendix 1 are included where? For Biosecurity to work efficiently, as much information as possible should be supplied by MAF to the importers so that the diseases can be intercepted at an early stage if they are present. If there is no information available, how else can the risks be quickly identified and eliminated? We need to work together on this.

6.11.9 Dead fish may be taken for disposal by the supervisor or with approval may be held as preserved specimens in 10% formaldehyde or any other method approved by MAF. The operator shall provide materials for the packaging of samples for further examination as required by the supervisor.

What happens to the dead fish if the supervisor chooses not to take the fish for disposal as "may" indicates that the requirement is optional?

6.11.11 No medication of chemicals or drugs is to be administered to ornamental fish or marine invertebrates without the approval of the supervisor. Treatments or prophylactic measures shall not interfere with disease surveillance and shall be recorded (see section 4.17).

This needs to be included. "The following medications may be used without prior approval of the supervisor: [insert the list of approved chemicals here – salt, formalin etc – ex NZFSAVA / IDC list].

"Alternatively, see Appendix Z for a list of chemicals that may be used without restriction" could also be used.

Protocols for approved medications can be developed with the assistance of the Supervisor. Approvals must be renewed annually.

6.14 Contingency plans

Contingency plans shall be in place to take account of a vehicle breakdown or accident during transport of ornamental fish, and fire, flooding or any other emergency. If an outbreak of exotic disease occurs provision shall be made to treat the water (section 6.9.1). Resources shall be identified and accessible for the contingency. The supervisor shall be advised of the emergency as soon as is possible. If an outbreak of exotic disease occurs provision shall be made to treat the water" (section 6.9.1) & has also been covered in 6.12 Occurrence of an exotic disease.

This should read "Contingency plans shall be in place to take account of a vehicle breakdown or accident during transport of ornamental fish, and fire, flooding, exotic disease outbreak or any other emergency".

Actions in the event of an exotic disease outbreak are clearly covered in section 6.12. Please remove the repetition.

6.18 Records

The operator is required to demonstrate compliance with this Standard by keeping records as required for the quality assurance programme and documented in the quarantine manual. The operator shall, for auditing purposes, maintain for three years the following records filed with each shipment:

§ Overseas supplier, country of origin, dates of arrival and release date.

§ Number of each ornamental fish and marine invertebrate species, in total, and by tank.

§ Details of clinical signs of disease, number affected in a tank and treatment.

§ Details of ornamental fish and marine invertebrate mortality by tank and species.

§ Details of water quality parameters.

§ Details of laboratory test results.

§ Details of destruction of packaging where MAF-approved methods are required.

§ Details of significant management changes, such as food changes, and power and aeration failures.

§ Biosecurity clearances.

§ Internal audits and corrective actions.

§ External audits and corrective actions.

This list needs resorting otherwise important relevant details will become lost in a stack of paper. Each tank of fish requires a shipment record. This may be either in paper or electronic format. The following records shall be kept together:

Group 1 covering details specific to a shipment as well as the details listed in section 6.11.1:

§ The number of fish dead and a brief description of any abnormalities on the cadavers, cause of death & microscopy findings.

§ Overseas supplier, country of origin, dates of arrival and release date.
 § Number of each ornamental fish and marine invertebrate species, in total, and by tank.
 § Details of clinical signs of disease, number affected in a tank and treatment.
 § Details of ornamental fish and marine invertebrate mortality by tank and species.
 § Biosecurity clearances.
 Group 2 covering details specific to the day to day running of the facility:
 § Details of water quality parameters.
 § Details of significant management changes, such as food changes, and power and aeration failures.
 § Details of destruction of packaging where MAF-approved methods are required.
 Group 3 covering annual recording requirements:
 § Internal audits and corrective actions.
 § External audits and corrective actions.

8.4 Supervision of a facility

8.4.1 Minimum requirements for inspection

The supervisor shall have a schedule for regular inspection of the facility and audit of operator's procedures. The supervisor shall make as many visits as considered necessary but the minimum number of visits is:

At about 28 days:

§ Make arrangements for biosecurity clearance for fresh water ornamental fish when requirements of 8.4.6 are met.

This should read "at about 25 days" to bring it line with the marine fish and invertebrate release guideline.

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Alois Wolloner

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1. Scope

The secondary purpose is to prevent the introduction of ornamental fish and marine invertebrate species that have not been approved for importation.

This has assumption that suggests that all fish operators are dishonest? Why would this need to be part of the scope, I don't see it in any other standards

6.11.1

The operator shall observe ornamental fish and marine invertebrates for signs of illness and abnormal behaviour periodically throughout the day. Records shall be kept by tank and species including at least:

~~The number of fish dead and a brief description of any abnormalities on the cadavers;~~

~~The number of fish showing signs of disease and a brief description of clinical signs;~~

- Rather onerous. Operators have far more to do than record pointless statistics of fish all day. Quarantine is be about looking for signs of exotic diseases than spending many hours recording fish deaths, This will lead to a paper war and endless meaningless spread sheets .
- How practical is it to describe 60 odd fish deaths when only few of a species die.

Suggest

- Any unusual levels of mortality or unusual signs of disease/pest (levels of mortality or illness must be recorded and the supervisor advised within 24 hours,

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All other proposals below to be deleted,

the number of fish dead and a brief description of any abnormalities on the cadavers; - *deleted*

the number of fish showing signs of disease and a brief description of clinical signs; - *delted*

water quality parameters (dissolved oxygen, nitrogenous wastes etc) on a regular basis, and when there are deaths or clinical signs of disease in fish

Operators should be competent enough to look after fish as outlined in 4.2 in the standard ,

Recording all this is just not practical, whilst water quality is important unsure how recording water parameters is going to help with anything. It will be filed and never seen again.

If a operator wants to record water tests that should be up to them,

SUGGEST

Delete statement as it is pointless and leads to more pointless recordings.

6.11.3

For species not considered high-risk, the operator must maintain records as detailed above and provide them to the supervisor at each visit and as requested. In addition, the operator must immediately notify the supervisor if more than 25% of the fish (by species or batch) suffers illness or mortality over a 96 hour period.

How does a % reflect there is a problem. 25% could be death of 1 fish if only 4 fish are imported.

For marine fish this is not practical.

Import 10 fish and 3 die that is 30%, That would hardly mean there is a issue with exotic disease. It also depends on the type of the fish as some fish are very difficult to keep and losses of 50% and over would not be uncommon in some species.

Fish deaths normally happen in the first week and slow down, and could again rise a little in the three week for marine fish due to starvation as they will not eat.

pointless, leads to more recording.

Reporting 25% or more is going to result in daily phone calls add more cost to operators.

Suggest

Reporting on disease should be based on clinical signs of the exotic disease and Only Unusually high mortalities or incidence of disease as listed in Appendix 1 of the MAF *Import Health Standard for Ornamental Fish and Marine Invertebrates*

Keeping it simple would be far more practical.

Having a 25% trigger is pointless

Only release fish have been inspected and healthy should be released.

Recording overall death rates would also be more practical, especially for marine fish.

Overall losses of say 10-35% is not uncommon, so if losses are significant say 40% of overall Shipment, then this should be reported.

6.11.4 For species considered to be high-risk, the operator must maintain records as detailed above and provide them to the supervisor at each visit and as requested. In addition, the operator must immediately notify the supervisor if fish display clinical signs of infection with pathogens listed in Appendix 1 of the MAF *Import Health Standard for Ornamental Fish and Marine Invertebrates* or unexplained mortality. Where the operator claims that mortalities are linked to non-listed pathogens, or to environmental causes, evidence must be presented to the supervisor.

Would serve the stakeholders well if MAF would provide information of these diseases to all operators and pet stores. If Bio security sees Fish of being such high risk why is information not provide?? It's been asked for the last 7 years and requested in most of the previous submissions.

Information is very limited on the internet, and is not in many of the fish disease books.

NZ has only about 6 fish importer to not very hard to provide training.

Communication/Training is the key to stopping exotic disease entering in New Zealand, not endless paper work and onerous conditions to import fish. It's a small industry so not hard to manage.

SUGGEST

Delete 6.11.4

6.11.5 If the supervisor decides a disease investigation is warranted based on clinical signs of illness or death of ornamental fish or marine invertebrates, the importer shall be given the option to test the fish (at the importer's expense) or destroy/reship the affected fish.

- If the supervisor request any test, negative results should be paid by the supervisor.

There is no protection for the operator from vindictive supervisors; supervisors need to take responsibility that any request for test are warranted.

Continuous testing for no real reason will put operators out of business.

6.2 Tanks must be fitted with lids (or approved equivalent) to prevent fish jumping out of the tanks and to minimise splash contamination.

For most part most fish don't jump or splash. And why would an operator let fish jump out.

We are aware which fish jump so we would put lids on those tanks.

Corals don't jump,? So why have lids on coral tanks.

Having lids on coral tanks is also a hindrance as it reduces the light the corals get due to the glass lids blocking the light. If you have Metal halides they get hot and crack the Lids.

Having water splash is part of having fish, I am unaware on any person who has never spilled water due to having a fish tank.

How do we clean tanks and catch fish if splash is a concern?

Any water splash will be contained in the quarantine facility so hence does not pose any additional risk .

Should any fish jump they are contained in the facility and are of no risk.

Obviously if a operator has continuous deaths to fish jumping then they should be warned to have lids on these tanks.

SUGGEST

It is recommended to have lids (or approved equivalent) to prevent fish jumping out of the tanks and to minimise splash contamination

6.11.12 (Should be added) new

The supplier shall be responsible for providing the operators with at least annual updated information on diseases listed in Appendix 1 of MAF Import Health Standard for Ornamental Fish and Marine Invertebrates.

6.12.2 In the event of a positive test result for an exotic disease all species of ornamental fish and marine invertebrates previously in the direct water system that are susceptible to the disease organism/s under investigation must also be tested and shown to be free of the relevant disease organism/s, or euthanased (in which case testing is not mandatory). Other fish in the shipment may be cleared one week after being moved to clean water or on successful completion of quarantine as determined by the supervisor, whichever is the longer.

- Why should other fish that are other susceptible species be tested if they are healthy and show no signs of exotic diseases. This must bring up animal welfare issues with Bio security destroying fish on a hint of a disease.
- It is not possible to house each susceptible species in its own water system .

Other species that are susceptible should be diagnosed based on clinical signs .

6.11.7 Testing or the decision not to test, and the consequences of a positive test result must be completed before other fish in the shipment are cleared. Other fish in the shipment may be cleared one week after being in a clean separate unstocked water system or on successful completion of quarantine as determined by the supervisor, whichever is the longer.

How realistic is that, Operators hardly have 30 odd spare tanks available to move fish too.

Freshwater quarantine is already 4 weeks and is one week higher that proposed by Bio security in previous submissions.

If fish look healthy and show no signs of exotic disease then they should be released,

Whilst some fish can show no signs of of iridovirus . Most would have shown it is 3-4 week.

Only species showing signs should be held back,

8.4.1

When a shipment arrives at the transitional facility the supervisor shall: correlate the invoice with the number (as close as possible) and species of ornamental fish and marine invertebrates as each bag is removed from the container.

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Why is it this necessary to have a full audit every time fish arrive? It takes so long to check for every fish. It is very time consuming and costs importers thousands of dollars a year for no added value. Fish Bags also get cold which effects the fish's health and ammonia levels build up in the bags , the operator ends up with hundreds of bags all over the place after checking by the supervisor as it is impossible to unload each bag into the tanks as they need to be acclimated in buckets which tanks 5-6 hours for marine fish. For single operators it is far worse as they have to also identify all the fish so no unpacking can be done , which delays unpacking fish and fish are in bags longer than they need be. Marine fish individually packed so hundreds of bags have to be counted.

Suggest

Random checks of say 30% of boxes that arrive. If any discrepancies then further boxes to be check. Also FSA can have unannounced full checks of all boxes. Another alternative could be that fish are checked within 48 hours of arrival. This will mean that fish will be able to be checked for disease and will not be stressed so they will show there true colours. FSA can then do random checks on numbers etc. much easier than having hundreds of bags on the floor. There could also be unannounced full checks are normal

Continuous discrepancies should result in a CAR and/or banning of the overseas supplier, also Operators that have relatively clean records should be rewarded with fewer checks. Also the Transitional facility standard allows for operators to report any non allowed species. See 6.6.2

Checking should be done based on the operator's performance in importing the correct species. The industry is always going to have dishonest operators like in all industries who try it on, so it is total discrimination to put each operator threw an audit of fish arriving in the transitional facility.

8.4.1 Minimum requirements for inspection

At every visit the supervisor **shall:**

- Check that the operator and the facility continue to meet the requirements of this Standard.
- Inspect the ornamental fish and marine invertebrates for any signs of disease.
- Match numbers of ornamental fish and marine invertebrate species in quarantine with supplier records.
- Check for the presence of non-approved ornamental fish and marine invertebrate species.
- inspect quarantine records.
- match numbers of ornamental fish and marine invertebrate species in quarantine with supplier records.
- inspect quarantine records.

How is this possible to do an audit on all of the above at each visit,? every visit is going to take 2-3 hours, costing operators hundreds,

Can wording change to

- At every visit the supervisor **may**

8.4.7 Non-compliance

For incidents of non-compliance the supervisor shall issue: a **critical situation report** for situations that may present a risk to biosecurity. For example, fish are released prior to clearance; not notifying of significant deaths ;

suggest to add

or continuous importation of non approved Ornamental fish

