

**NEW ZEALAND'S COMMENTS**  
**ON**  
**THE REPORT OF THE SEPTEMBER 2009 MEETING**  
**OF**  
**THE OIE AQUATIC ANIMAL HEALTH STANDARDS COMMISSION**

**15 December 2009**

New Zealand thanks the Aquatic Animal Health Standards Commission for its work and for the opportunity to offer comment on proposed revisions to *Aquatic Animal Health Code* texts.

**A request on harmonisation of the *Aquatic* and *Terrestrial Codes***

The glossary of the *Aquatic Animal Health Code* has the following definition;

***Basic biosecurity conditions***

means a set of conditions applying to a particular disease, and a particular zone or country, required to ensure adequate disease security, such as:

- a. the disease, including suspicion of the disease, is compulsorily notifiable to the Competent Authority; and
- b. an early detection system is in place within the zone or country; and
- c. import requirements to prevent the introduction of disease into the country or zone, as outlined in the Aquatic Code, are in place."

New Zealand proposes the following change to this text;

***Basic biosecurity conditions***

means a set of conditions applying to a particular disease, and a particular zone or country, required to ensure adequate disease security, such as:

- d. ~~the it is a notifiable disease, including suspicion of the disease, is compulsorily notifiable to the Competent Authority; and~~
- e. an early detection system is in place within the zone or country; and
- f. import requirements to prevent the introduction of disease into the country or zone, as outlined in the Aquatic Code, are in place."

Then, it would be necessary to add the following definition to the *Aquatic Animal Health Code*;

**Notifiable disease**

means a disease listed by the to the *Competent Authority*, and that, as soon as detected or suspected, must be brought to the attention of this Authority, in accordance with national regulations.

**Rationale:** Alignment of the *Terrestrial* and *Aquatic Animal Health Codes* is highly desirable.

Currently, the *Aquatic Animal Health Code* uses an effective definition of *basic biosecurity conditions* to cover a range of disease security measures with a single reference. However, the *Aquatic Code* does not have a definition of *notifiable disease*. It would be helpful if the definition of *basic biosecurity conditions* were to be modified so that the *Aquatic Code* has a definition aligned to the *Terrestrial Code*.

## Glossary

### Proposed alternative:

#### *Veterinary Services*

means the governmental and non-governmental organisations that implement animal health and welfare measures and other standards and recommendations in the OIE Codes in the territory. The Veterinary Services are under the overall control and direction of the Veterinary Authority. Private sector organisations, veterinarians, veterinary paraprofessionals or aquatic animal health professionals ~~are normally accredited or~~ should be approved by the Veterinary Authority to deliver the delegated functions.

**Rationale:** Within this context, we consider that it is essential that the status of “aquatic animal professional” be limited to **health** professionals. In countries where “aquatic animal health professional” is not a recognised qualification, it is essential that the Veterinary Authority should accredit or approve the status.

## CHAPTER 4.X. APPLICATION OF COMPARTMENTALISATION

### Article 4.X.1.

#### Proposed alternative:

[...]

Establishing and maintaining a disease free-status throughout the country should be the ~~final~~ ultimate goal for OIE Members. However, establishing and maintaining a *disease-free* status for an entire country may be difficult, especially in the case of *diseases* that can easily cross international boundaries. For many *diseases*, OIE Members have traditionally applied the concept of zoning to establish and maintain an animal *subpopulation* with a different animal health status within national boundaries.

The essential difference between zoning and compartmentalisation is that the recognition of *zones* is based on geographical boundaries whereas the recognition of *compartments* is based ~~on~~ on management ~~practices~~ and biosecurity practices. However, spatial considerations and good management practices play a role in the application of both concepts.

[...]

In *disease-free* countries or *zones*, it is preferable that compartments ~~preferably should be~~ are defined prior to the occurrence of a *disease outbreak*. In the event of an *outbreak* or in infected countries or *zones*, compartmentalisation may be used to facilitate trade.

**Rationale:** Improved English.

### Article 4.X.2.

#### Proposed alternative:

A *compartment* may be established with respect ~~of~~ to a specific *disease* or *diseases*. A *compartment* must be clearly defined, indicating the location of all its components including establishments, as well as related functional units (such as brood stock facilities, hatcheries, nurseries, grow-out facilities, slaughterhouses, processing plants etc.), their interrelationships and their contribution to an epidemiological separation between the *aquatic animals* in a *compartment* and *subpopulations* elsewhere with a different health status. The

definition of *compartment* may revolve around *disease* specific epidemiological factors, production systems, biosecurity practices infrastructural factors and *surveillance*.

**Rationale:** Correct English. Clarity.

#### **Article 4.X.3., section 3, last paragraph**

**Proposed alternative:**

In any case, sufficient evidence should be submitted to assess the efficacy of the *biosecurity* plan in accordance with the level of *risk* for each identified pathway. This evidence should be structured in line with the principles of Hazard Analysis and Critical Control Point (HACCP). The biosecurity risk of all operations of the *compartment* should be ~~regularly~~ re-assessed and documented at least on a yearly basis. Based on the outcome of the assessment, concrete and documented mitigation steps should be taken to reduce the likelihood of introduction of the disease agent into the *compartment*.

**Rationale:** 'Regularly' is redundant as it is addressed by "at least on a yearly basis".

#### **Article 4.X.4.**

**Proposed alternative:**

Documentation must provide clear evidence that the biosecurity, *surveillance*, *traceability* and management practices defined for a *compartment* are effectively and consistently applied. In addition to animal movement information, the necessary documentation should include production unit records (e.g. cage, pond), feed sources, laboratory tests, ~~death~~ mortality records, ~~the~~ visitor logbook, morbidity history, medication and vaccination records, *biosecurity plans*, training documentation and any other criteria necessary for the evaluation of *disease* exclusion.

**Rationale:** "Mortality" is a more appropriate term. "The" is unnecessary in the context.

#### **Article 4.X.5.**

**Proposed alternative:**

If there is, at any time, an increased *risk* of exposure to the agent for which the *compartment* has been was defined, the ~~detection-level~~ sensitivity of detection of the internal and external *surveillance* should be reviewed and, where necessary, ~~raised~~ increased. At the same time, biosecurity measures in place should be reassessed and increased if necessary.

**Rationale for proposed alternative text:** "Was" is better than "has been". "Detection level" is an imprecise term. The word "level" is commonly used in a rather loose fashion to refer to a number of different measurables. It should be avoided. What is being referred to is the sensitivity of the surveillance system, the ability to detect disease at a certain target prevalence. "Sensitivity of detection" is preferable to the current wording.

### **CHAPTER 4.5. CONTROL OF HAZARDS OF AQUATIC ANIMAL HEALTH AND PUBLIC HEALTH IMPORTANCE IN AQUATIC ANIMAL FEEDS**

#### **Article 4.5.4.**

**Proposed alternative:**

14. Cross-contamination

It is necessary that relevant provisions to the prevention of contamination of feed or feed ingredients during their manufacture, storage, distribution (including transport) and ~~the use of~~

~~feed and feed ingredients and relevant provisions should be included in current regulations and standards. Scientific evidence, including the sensitivity of analytical methods and on the characterisation of risks, should be drawn upon in developing this framework. Procedures, such as flushing, sequencing and physical clean-out, should be used to reduce the likelihood of contamination between batches of feed or feed ingredients.~~

~~Procedures such as flushing, sequencing and physical clean-out should be used to avoid cross-contamination between batches of feed or feed ingredients. National regulations should be followed in order to avoid the use of unauthorised *feed ingredients* with a risk of cross-contamination.~~

**Rationale:** “Cross-contamination” is just one type of contamination and the more general term is preferable. The *Terrestrial Animal Health Code* uses the broader term “contamination” in the heading and the *Aquatic Code* should align in terminology with the *Terrestrial Code* unless there is good reason not to. The proposed alternative text is better English. A redundant passage is deleted.

## CHAPTER 11.X. INFECTION WITH ABALONE HERPES-LIKE VIRUS

### Article 11.X.5., section 3

**Proposed alternative:**

- b) targeted surveillance, as described in Chapter 1.4. of the *Aquatic Code*, has been in place for at least the past 2 years without detection of abalone herpes-like virus.

**Rationale:** Clarity, grammar.

### Article 11.X.9.

**Proposed alternative:**

... if justified, require that:

1. the consignment be delivered directly to and held in quarantine or containment facilities until processing into one of the products referred to in point 1 of Article 11.2.3, or products described in point 1 of Article 11.2.11, or other products authorised by the *Competent Authority*; and/or consumption; and
2. all effluent and waste material from the processing be treated in a manner that ensures inactivation of *abalone herpes-like virus* or is disposed in a manner that prevents contact of waste with susceptible species.

~~This Article does not apply to *commodities* referred to in point 1 of Article 11.2.X.3. For these *commodities* Members may wish to consider introducing internal measures to address the risks associated with the *commodity* being used for any purpose other than for human consumption.~~

**Rationale:** For consistency with other proposed Articles.

### Article 11.X.11.

**Proposed alternative:**

1. *Competent Authorities* should not require any *abalone herpes-like virus* related conditions, regardless of the *abalone herpes-like virus* status of the *exporting country, zone or compartment* when authorising the importation or transit of the following *commodities* which have been prepared and packaged for retail trade and complying with Article 5.3.2.:

For these commodities Members may wish to consider introducing internal measures to address the risks associated with the commodity being used for any purpose other than for human consumption.

2. When importing live aquatic animals or aquatic animal products, other than those referred to in point 1 above, of the species referred to in Article X.X.2. from a country, zone or compartment not declared free from abalone herpes-like virus, the Competent Authority of the importing country should assess the risk and apply appropriate risk mitigation measures.

~~When importing aquatic animal products of species referred to in Article 112.2.X.2. from a country, zone or compartment not declared free from abalone herpes-like virus, the Competent Authority of the importing country should assess the risk and apply appropriate risk mitigation measures.~~

~~This Article does not apply to commodities referred to in point 1 of Article 112.2.X.3.~~

**Rationale:** For consistency with other proposed Articles.

## CHAPTER 9.X. NECROTISING HEPATOPANCREATITIS

### Article 9.X.9.

**Proposed alternative:**

When importing, for human consumption, live *aquatic animals* of the species referred to in Article 9.X.2. from a country, zone or compartment not declared free from NHP, the Competent Authority of the importing country should assess the risk and, if justified, require that:

1. the consignment be delivered directly to and held in quarantine or containment facilities until processing to one of the products referred to in point 1 of Article 9.2.3, or products described in point 1 of Article 9.2.11, or other products authorised by the Competent Authority; and
2. all effluent and waste material from the processing be treated in a manner that ensures inactivation of NHP or is disposed in a manner that prevents contact of waste with susceptible species.

For these commodities Members may wish to consider introducing internal measures to address the risks associated with the commodity being used for any purpose other than for human consumption.

1. ~~the consignment be delivered directly to and held in isolation until processing and/or consumption; and~~
2. ~~all effluent, dead aquatic animals and waste materials from the processing be treated in a manner that ensures inactivation of NHP-B.~~

~~Members may wish to consider introducing internal measures to prevent such commodities being used for any purpose other than for human consumption.~~

~~This Article does not apply to commodities listed in point 1 of Article 9.X.3.~~

**Rationale:** Consistency with proposed wording for all disease chapters.

### Article 9.X.11.

**Proposed alternative:**

When importing *aquatic animal products* of the species referred to in Article 9.X.2. from a country, zone or compartment not declared free from NHP, the Competent Authority of the

~~importing country should assess the risk and apply appropriate risk mitigation measures.~~

1. Competent Authorities should not require any *abalone herpes-like virus* related conditions, regardless of the *abalone herpes-like virus* status of the *exporting country, zone or compartment* when authorising the importation or transit of the following *commodities* which have been prepared and packaged for retail trade and complying with Article 5.3.2.:

For these *commodities* Members may wish to consider introducing internal measures to address the *risks* associated with the *commodity* being used for any purpose other than for human consumption.

2. When importing *live aquatic animals or aquatic animal products*, other than those referred to in point 1 above, of the species referred to in Article X.X.2. from a *country, zone or compartment* not declared free from *abalone herpes-like virus*, the *Competent Authority of the importing country* should assess the *risk* and apply appropriate *risk mitigation measures*.

~~This Article does not apply to *commodities* listed in point 1 of Article 9.X.3.~~

**Rationale:** Consistency with proposed wording for all disease chapters.

### CHAPTER 7.3. SLAUGHTER OF FARMED FISH FOR HUMAN CONSUMPTION

**Comment:** This chapter does not actually detail killing methods, as opposed to stunning methods. It is accepted that some stunning methods do *per se* result in the death of the animal. However, as highlighted in some parts of this text, others do not. It is therefore suggested that the *Code* makes it explicit that stunning is followed by killing e.g. severance of gill arches or ventral aorta to result in fatal exsanguination.

#### Article 7.3.6.

##### Proposed alternative:

- f) While ~~absence of~~ unconsciousness may be difficult to recognise, signs of correct stunning include i) loss of respiratory movement (loss in opercular activity); ii) loss of visual evoked response (VER); iii) loss of vestibulo-ocular reflex (VOR, eye rolling).

**Rationale:** Clarity.

**Comment:** Some experts question whether this is actually realistic during harvesting. They ask whether it is realistic to assess visual evoked response in such situations.

#### Article 7.3.6., section 3

##### Proposed alternative:

- a) Electrical stunning involves the application of an electrical current of sufficient strength, frequency and duration to cause immediate ~~unconsciousness~~ loss of consciousness and insensibility of the fish. In fresh water, ~~the water conductivity is essential to establish parameters of the electrical current suitable~~ should be assessed and, where appropriate, adjusted to ensure appropriate stunning is achieved.
- b) The electrical stunning device should be ~~constructed and used~~ suitable for the specific fish species and their environment.

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- c) Electrical stunning may be reversible. In such a cases u fish should be killed before consciousness is recovered.

**Rationale:** Clarity.

**Article 7.3.6., section 4**

**Proposed alternative:**

The following other methods are known to be used: carbon dioxide (CO<sub>2</sub>) in holding water; chilling with ice and CO<sub>2</sub> in holding water; salt or ammonia baths; asphyxiation by removal from water; exsanguination without stunning. However, they have been shown to result in poor fish welfare. It is preferable to use the methods described in points 2., and 3. ~~and 4.~~ of this Article, as appropriate to the fish species.

**Rationale:** Reference to point 4 is circular and inappropriate as those methods listed in point 4 are considered by the OIE to be less than ideal.