



# Review of Submissions

Draft Import Health Standard for Ornamental Fish and  
Marine Invertebrates

2016

**Ministry for Primary Industries**

Te Manatū Ahu Atua  
Pastoral House  
25 The Terrace  
P O Box 2526  
Wellington  
New Zealand

Telephone: +64 4 894 0100  
Facsimile: +64 4 894 0733  
Internet: <http://www.mpi.govt.nz>

**Regulation & Assurance**

**REVIEW OF SUBMISSIONS**

Ornamental Fish and Marine Invertebrates

2016

Approved for general release

**Howard Pharo**

Manager Import and Export Animals  
Ministry for Primary Industries

---

# Contents

<b>1</b>	<b>Introduction</b>	<b>5</b>
1.1	Acronyms Used in the Document	5
<b>2</b>	<b>Summary of Amendments</b>	<b>6</b>
2.1	Other Amendments	7
<b>3</b>	<b>Review of Submissions</b>	<b>8</b>
3.1	Peter Willcox	8
3.2	Henward Tan, Aquarium Hobbyist	8
3.3	Daniel Logan	8
3.4	Paul Decker, Aqua Aotearoa	9
3.5	David Cooper, EnterpriseMIT Ltd	9
3.6	Joseph Troost	10
3.7	Cam Parsonson	10
3.8	Sam Hurley	11
3.9	Berni Pert, Pet Essentials Napier	12
3.10	John and Tracey Drummond, Kamo Pet Shop	12
3.11	Robert Hutton, Aquagrow	12
3.12	John Walsby	13
3.13	Cam Scott	13
3.14	Barry Mathews, Happy Fish Ltd	13
3.15	Nikki Almond, Animates	13
3.16	Verity Forbes, Department of Conservation	14
3.17	Nathan Hockly	16
3.18	Murray Barker, Global Goldfish Ltd	16
3.19	Alex Fleming, Fishwise	17

---

3.20	Kerry Hewitt	18
3.21	Kerry Hewitt, National Aquarium	18
3.22	Timothy Brewerton	18
3.23	Alice Collins, The Big Fish Pet Supplies	19
3.24	Brenda Chalmers, RetailNZ Trade Group	20
3.25	Natasha Walsh	20
3.26	Mark Paterson, Federation of New Zealand Aquatic Societies	20
3.27	Trent Lloyd	21
3.28	Warren Garrett, Brooklands	22
3.29	Josiah Pit, Aquarium Industries	24
3.30	Peter Wilcox, Genesis Aquaculture	27
3.31	Arnja Dale, SPCA	29
3.32	Greg, Fish 2 Water NZ	31
3.33	Canadian Food Inspection Agency	32
3.34	Agri – Food and Veterinary Authority Singapore	32
<b>4</b>	<b>Copies of Submissions</b>	<b>35</b>
4.1	Peter Willcox	35
4.2	Henward Tan	35
4.3	Danial Logan, Reef Imports NZ	36
4.4	Paul Decker, Mahurangi Technical Institute	37
4.5	David Cooper, Enterprise MIT	38
4.6	Joseph Troost	38
4.7	Cam Parsonson, Calibre Projects	39
4.8	Sam Hurley	41
4.9	Bern Pert, Pet Essentials Napier	41
4.10	John and Tracey Drummond, Kamo Pet Shop	41
4.11	Robert Hutton, Aquagrow	43
4.12	John Walsby	45

---

4.13	Cam Scott	45
4.14	Barry Mathews	46
4.15	Nikki Almond, Animates	47
4.16	Verity Forbes, Department of Conservation	49
4.17	Nathan Hockly	51
4.18	Murray Barker, Global Goldfish Ltd	52
4.19	Alex Fleming, Fishwise	58
4.20	Kerry Hewitt	62
4.21	Kerry Hewitt, National Aquarium	62
4.22	Timothy Brewerton	63
4.23	Alice Collins, The Big Fish Pet Supplies	64
4.24	Brenda Chalmers, RetailNZ Trade Group	65
4.25	Natasha Walsh	66
4.26	Mark Paterson, Federation of New Zealand Aquatic Societies	67
4.27	Trent Lloyd	68
4.28	Warren Garrett, Brooklands	69
4.29	Josiah Pit, Aquarium Industries	72
4.30	Peter Wilcox, Genesis Aquaculture	78
4.31	Arnja Dale, SPCA NZ	81
4.32	Greg, Fish 2 Water NZ	2
4.33	Canadian Food Inspection Agency	3
4.34	Agri – Food and Veterinary Authority of Singapore	5

---

# 1 Introduction

The draft import health standard for the importation into New Zealand of Ornamental Fish and Marine Invertebrates was notified for consultation on 22 July 2016.

The Ministry for Primary Industries (MPI) received submissions from the following:

Peter Willcox	22 July 2016
Henward Tan, Aquarium Hobbyist	22 July 2016
Daniel Logan	23 July 2016
Paul Decker	29 July 2016
David Cooper	29 July 2016
Joseph Troost	30 July 2016
Cam Parsonson	3 August 2016
Sam Hurley	6 August 2016
Berni Pert	26 August 2016
John and Tracey Drummond	2 September 2016
Robert Hutton	9 September 2016
John Walsby	5 September 2016
Cam Scott	8 September 2016
Barry Mathews	13 September 2016
Animates	15 September 2016
Verity Forbes, DOC	16 September 2016
Nathan Hockly	19 September 2016
Murray Barker	20 September 2016
Alex Fleming	20 September 2016
Kerry Hewitt	21 September 2016
Kerry Hewitt, National Aquarium	21 September 2016
Timothy Brewerton	21 September 2016
Alice Collings, The Big Fish Pet Supplies	22 September 2016
Brenda Chalmers, RetailNZ Trade Group	22 September 2016
Natasha Walsh	22 September 2016
Mark Paterson, Federation of NZ Aquatic Societies	22 September 2016
Trent Lloyd	22 September 2016
Warren Garrett, Brooklands	22 September 2016
Josiah Pit, Aquarium Industries	22 September 2016
Peter Wilcox, Genesis Aquaculture	23 September 2016
Arnja Dale, SPCA	22 September 2016
Greg	25 September 2016
Canadian Food Inspection Agency	24 September 2016
Agri – Food and Veterinary Authority of Singapore	26 September 2016

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

## 1.1 Acronyms Used in the Document

MPI	Ministry for Primary Industries		
IRA	Import Risk Analysis		


## 2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the *Import Health Standard for Ornamental Fish and Marine Invertebrates*.

**Schedule 2 definitions** – the definition for batch has been updated to ‘all ornamental fish or marine invertebrates sharing a direct water system and susceptibility to any specified risk organism from Part 2 of the MPI *Import Health Standard: Ornamental Fish and Marine Invertebrates*. For the purposes of testing for identified risk organisms, testing must take place not less than 2 weeks after the last fish was introduced to the batch.’

**Part 1 clause 1.5** has been amended to include HS code 0508 ‘coral and similar materials, unworked or simply prepared, shells of molluscs, crustaceans or echinoderms and cuttle-bone, not cut to shape powder and waste thereof’

**Part 1 clause 1.8** has been amended to state that ‘Internal packaging must be leak-proof, transparent and clearly labelled, and have a transparent area to enable easy viewing of content without opening the packaging.’

**Part 1 clause 1.10.1 b)** has been amended and moved to clause 1.9.1 to allow for the list of species in a planned consignment to be provided to MPI 72 hours in advance rather than as part of the permit application.

**Part 1 Guidance:** Inspection and verification has been amended to say ‘see clause 1.9(3)’.

**Part 1.11** The requirement that ornamental fish and marine invertebrates must remain free from clinical signs of disease during the entire PEI time has been removed.

**Part 1 clause 1.11(1)g)iii)** has been updated to read:

‘In the event of a positive test result for a disease listed in Part 2 of this IHS:

The batch must be tested by an MPI-approved method and shown to be free of the relevant disease organism/s, or euthanised.

Protective clothing, packaging, tanks and equipment from the direct water system and any parts of the facility that are potentially contaminated must be thoroughly cleaned and disinfected or destroyed.’

**Part 3 clause 6** ‘MPI approved facility’, the word MPI was removed as the intention is that facilities are approved as per the process of exporting country systems and certification assessment.

**Part 3 clause 9** has been updated to: ‘During and following PEI, ornamental fish and marine invertebrates have been kept isolated from other ornamental fish and marine invertebrates not of an equivalent health status. Management procedures to keep these ornamental fish and marine invertebrates in a separate biosecure area was followed.’

**Part 1 clause 1.11(1)e)iii)** has been amended to state if a positive test result or high unexplained mortalities occur, ornamental fish and marine invertebrates are removed from the consignment for any reason other than routine testing, or if isolation has been breached, MPI must be notified and give approval for the importation to proceed.

**Part 2** Country, zone or compartment disease freedom has been added as an option for the specified requirements for identified risk organisms.

**Part 1 clause 1.11** ‘The premises are emptied and thoroughly cleaned and disinfected before the commencement of each PEI’ was removed.

**Part 1 clause 1.11** headings 'management' and 'operation' were merged into one 'management and operations' and the clause stating that 'all equipment used in the feeding, handling and treatment of ornamental fish and marine invertebrates in PEI is new or cleaned and disinfected before the commencement of the PEI was moved to 1.11(1)d)i).

Copies of all external stakeholder submissions in their entirety are presented in Appendix 1.

## 2.1 Other Amendments

The following changes have been made to the IHS. These changes are the result of MPI's own further considerations of the documents:

- General editing to formatting.
- Minor rewording for clarity of requirements.
- The wording for Guidance Biosecurity Clearance – clause a)i) has been amended to state 'On arrival. This visit may be performed up to 24 hours following arrival, at the discretion of the Inspector.'

This amendment still allows for long standing operators with an excellent compliance history to benefit by decreasing compliance costs, but allows more flexibility for the inspector to make a decision on a case by case basis.

|



## 3 Review of Submissions

### 3.1 Peter Willcox

- 3.1.1 Batch definition:** Schedule 2 of the standard defines a batch as ‘all ornamental fish or marine invertebrates sharing a direct water system and susceptibility to any specified risk organism from Part 2 of the MPI *Import Health Standard: Ornamental Fish and Marine Invertebrates*. Peter Wilcox expressed concern over this definition as he believes creating ‘batches’ by combining fish into a common body of water post arrival and then testing a percentage of batch does not adequately represent the disease prevalence.

#### **MPI Response**

MPI has noted Peter Wilcox’s comments, and will amend the definition of ‘batch’ in the IHS accordingly. ‘All ornamental fish or marine invertebrates sharing a direct water system and susceptibility to an identified risk organism from Part 2 of the MPI Import Health Standard: *Ornamental Fish and Marine Invertebrates*. For the purposes of testing for specified risk organisms, testing must take place not less than 2 weeks after the last fish was introduced to the batch.’

A batch is the cohort of fish that are (a) in the same water system, and (b) susceptible to the same hazards listed in the IHS. The cohort of fish will be counted as a batch after at least two weeks from the time they are put in the shared water system at the TF and not prior. This definition of batch will apply only to those hazards that are identified in the IHS as requiring testing.

### 3.2 Henward Tan, Aquarium Hobbyist

- 3.2.1 Eligible species:** Henward Tan requested the addition of species such as freshwater stingrays, *Plecostomus* and freshwater pufferfish to the list of eligible species.

#### **MPI Response**

Ornamental fish and marine invertebrates eligible for import, under the Hazardous Substances and New Organisms (HSNO) Act, are those species present in New Zealand before 1 July 1998. This list was then assessed by the Department of Conservation (DOC), the National Institute of Water and Atmospheric Research (NIWA) and the Federation of New Zealand Aquatic Societies (FNZAS). Fish that are potentially harmful to New Zealand (i.e. able to survive in New Zealand and establish a self-sustaining population) were removed from the list. The amended eligible list was finalised in March 2007. Addition of species requires approval under the Hazardous Substances and New Organisms (HSNO) Act, which is administered by the Environmental Protection Authority (EPA).

### 3.3 Daniel Logan

- 3.3.1 Eligible species:** Daniel Logan requested that only fish that have been bred in captivity (i.e. not taken from the wild) should be eligible for import and that the list of eligible species should be extended to include more coral and fish species.

#### **MPI Response**

Many people share Mr Logan’s view, but this is not currently a biosecurity issue so is not able to be considered in this forum. In regards to adding species to the list please see MPI’s response to 3.2.1 above.

---

### **3.4 Paul Decker, Aqua Aotearoa**

#### **3.4.1 Permits: I would like to express our support for the draft IHS. In particular we are in favor of the allowance for offshore transitional facilities.**

It is our opinion that this IHS will allow for huge economic growth in the ornamental fish industry and of course a subsequent increase in employment within the sector. There will also be improved professional standards and improved animal welfare standards.

This IHS paves the way for a "great leap forward" in the New Zealand ornamental fish industry and is to be applauded.

Our one criticism would lie in the "guidance box" under section 1.9 which states;

"Import permits will be valid for one year for consignments of ornamental fish and marine invertebrates described in 1.1.1(1)a)i) and for a single consignment only for ornamental fish and marine invertebrates described in 1.1.1(1)a)ii)."

We would question why NZ based TF operators require import permits on an annual basis while offshore operators require one per consignment. This seems to be an anomaly and inequitable.

#### **MPI Response**

Ornamental fish and marine invertebrates that have undergone offshore quarantine will be cleared on arrival if they meet the IHS requirements. MPI uses permits to direct consignments to approved transitional facilities, but also to convey equivalence decisions to border staff, and to ensure that specialist veterinary inspectors are available at the correct time to ensure that live animals are checked and cleared as quickly as possible with no delays at the border. This will be particularly important for live fish, where there are no transitional facilities if fish cannot be immediately checked. Other 'booking' mechanisms may be considered in the future, but for this new trade (ornamental fish that will be cleared at the border) a permit for each consignment will initially be required, as agreed by MPI standards setting and operational staff.

### **3.5 David Cooper, EnterpriseMIT Ltd**

#### **3.5.1 Permits: I would like to express support for the draft IHS. I am particularly supportive of the fact that it will facilitate offshore quarantine of live fish and invertebrates.**

This IHS will be a driver for economic growth in the ornamental fish industry. An improvement in professional standards and in animal welfare standards can also be expected as side benefits. I do have a question though regarding section 1.9

"Import permits will be valid for one year for consignments of ornamental fish and marine invertebrates described in 1.1.1(1)a)i) and for a single consignment only for ornamental fish and marine invertebrates described in 1.1.1(1)a)ii). "

I wonder why NZ based Transitional Facility operators get permits on an annual basis while offshore operators need one per consignment. This seems unnecessary.

#### **MPI Response**

Please see MPI response 3.4.1 above.

---

### 3.6 Joseph Troost

- 3.6.1 **Eligibility:** Joseph Troost, in his submission, has requested the addition of species to the approved species list as well as reducing the cost of importation of ornamental fish and marine invertebrates.

#### **MPI Response**

Please see MPI's response 3.2.1 above.

### 3.7 Cam Parsonson

- 3.7.1 **Offshore quarantine:** The new draft standard for transitional facilities shows no clear thought has been given to natural hazards and strengthening the requirements for containment and management. Our new building has been designed with a bund cast in, capable of containment of 100% of lost water in an event. The tank stands will be bolted to the floor and have had bracing designed to improve resilience. We consider that the standard for facilities is still relatively low.

We believe that certification of offshore quarantine will be haphazard at best and easily forged, falsified and subject to manipulation of quarantined species and duration. It is hard to visualise the difference between a modern fish production facility overseas and the transitional facility requirements detailed.

#### **MPI Response**

Ornamental fish and marine invertebrates will only be imported directly from countries where the Competent Authority has provided information on exporting systems and certification to the satisfaction of the MPI CTO (I.6 in the IHS). MPI will assess that the Competent Authority is credible and trustworthy, and has regulatory oversight of pre-export isolation (PEI) facilities to ensure they are compliant with the IHS. MPI undertakes this biosecurity step in a very thorough manner. Trust in Competent Authorities that have been approved to follow our IHSs and certify animals for export is an essential part of MPI's biosecurity system; without this New Zealand would not have any import or export trade.

The PEI requirements detailed in the IHS are equivalent to the requirements in the transitional facility standard, with the exception that they do not include any waste water treatments. Biosecurity requirements will be met to the same standard as they are through existing onshore transitional facilities.

Meeting biosecurity requirements offshore is considered in general a preferable model by MPI, as hazards are dealt with before arrival in New Zealand. Most risk mitigation measures for other live animal imports to New Zealand are met offshore in PEI, with ornamental fish up until now being the exception.

- 3.7.2 **Offshore Quarantine will effectively deregulate the industry:** Offshore Quarantine will effectively deregulate the industry as pet stores can bypass onshore quarantine entirely. We see this as encouraging personal imports where people will try to bring in shipments themselves, encouraging risk taking and misdeclaration by more unscrupulous individuals as the ability to import directly will push desire for illegal species. Loading formal identification onto customs staff, rather than an inspecting veterinarian, will also cause more unapproved species to get in. We see this as a definite step in the wrong direction, as our view of quarantine is primarily the control of permitted species and government verification of such.

#### **MPI Response**

Ornamental fish that are imported from approved countries undergo pre-export isolation in approved facilities, and are certified by an official veterinarian to be an approved species that have undergone all required disease testing. The ornamental fish will then be checked again by an official veterinarian in New Zealand before release.

---

MPI cannot see any relationship between the option for PEI and an increase in illegal importation of ornamental fish.

- 3.7.3 Risk of offshore quarantine:** We believe that vet certification and laboratory works overseas are also risky beyond doubt. Modification of documents etc. is highly likely. Offshore Quarantine prior to shipment is moot without full laboratory testing for each species without exception. MPI seems to ignore the fact that it is the shipping that is the primary stressor that brings out the viral/bacterial infections that we see in quarantine. The fish can carry the virus, but only exhibits once its immune system has been compromised. The fish have been bred overseas and have attained full size and carry the virus. It is only once stressed that the virus emerges. We still own a retail fish store and we still regularly lose fish to viral infections etc post quarantine by other parties, which have survived the quarantine period, only to succumb when the next stressor allows the pathogen to take hold; when they arrive in our store after a short shipping from the north island.

**MPI Response**

Ornamental fish that have met PEI requirements in an approved country prior to import to New Zealand will undergo the same travel stress as fish that undergo quarantine in a transitional facility in New Zealand.

- 3.7.4 Governmental culpability/liability for fallout relating to the standard changes and subsequent breaches.** As MPI is a faceless government institution, we will see no CEO or managerial staff losing their jobs or facing reprimand for this decision and subsequent illegal imports or disease breaches if this standard goes live. It will also be difficult to control or penalise individuals & store importers as they could continue to import without a licensing requirement.

**MPI Response**

See response 3.7.1 and 3.7.2.

- 3.7.5 Goldfish:** We welcome the goldfish importation requirement, but this should be conditional on full virus testing of the species concerned without exception and the imports should be low volume imports allowed for introduction of breeding genetics to aid the New Zealand goldfish industry NOT for general goldfish sales, as we see this as ongoing high risk behaviour.

**MPI Response**

Tests and treatments of all imported fish are as required in the IHS, whether through the PEI or transitional facility quarantine process. Import requirements for goldfish are unchanged in the draft IHS from the existing IHS, other than they are no longer considered susceptible to iridoviruses.

## **3.8 Sam Hurley**

- 3.8.1 Offshore quarantine:** I would like to support the changes to the IHS for ornamental and pet fish. I support the opening of the market, overseas quarantine, improved regulation that I feel will improve the welfare of the millions of fish kept as pets in NZ.

**MPI Response**

MPI acknowledges Sam Hurley's support of the updated requirements, no changes required.

---

### **3.9 Berni Pert, Pet Essentials Napier**

- 3.9.1 Offshore quarantine:** I support the proposed IHS because I believe that it will provide a stimulus and encourage economic growth in the NZ aquarium industry with consequentially more employment.

It will lead to an improvement in the professional standards in the ornamental fish industry  
It will lead to better animal welfare outcomes for the 1.5 million live ornamental fish kept at any one time in NZ.

#### **MPI Response**

MPI acknowledges comments made by Pet Essentials Napier, no changes required.

### **3.10 John and Tracey Drummond, Kamo Pet Shop**

- 3.10.1 Offshore quarantine:** We would like to express our support for the proposed IHS. We truly believe that this is a fantastic idea and will encourage a great increase in economic growth in New Zealand Aquatic industry, as well as more employment opportunities which is greatly needed.

By bringing forward this proposal we believe they will improve the standards and animal welfare outcomes for the ornamental fish industry. Health and wellbeing is a major factor and concern in our opinion for the ornamental trade been imported into NZ. And knowing that these types of standards that are been proposed is a great feeling of improvement for all of us involved in this field we live and breathe on a daily basis.

#### **MPI Response**

MPI acknowledges support of the updated requirements by Kamo Pet Shop, no changes required.

### **3.11 Robert Hutton, Aquagrow**

- 3.11.1 Offshore quarantine:** There is very limited ornamental fish breeding in New Zealand currently and the cost of fish is high compared to the global market place. Similarly volumes of fish available are small and the range of species restricted. Whilst there is a relatively large list of species available for import, the reality is that few species are imported. The availability of live fish is a driving force for the sale of all the ancillary equipment and services required to keep them and that industry is many many times the size of the value of the fish trade alone.

Fish quality at present tends to be poor and inconsistent which is a constraining factor on our various businesses and I am certain on the wider industry.

I therefore support the introduction of pre-export isolation as an additional route to import fish as well as the current quite restricted post importation quarantine through the existing transitional facilities here in New Zealand.

The clauses in the draft IHS allowing offshore isolation will allow larger volumes of fish to safely enter New Zealand than is currently possible. This will result in:

- Cost efficiencies in the process that can mean more competitive prices for fish, benefitting the fish keeping hobby here in New Zealand.
  - More fish will be available through the retail chains, which is of benefit to retailers, their employees and the industry at large.
-

- Fish are likely to be of better quality – larger importers have more buying power which will likely mean higher quality fish than is the case at present
- Better quality fish tend to represent a lower risk as they will be more likely be healthier and less likely to be carriers of disease.
- A wider range of fish than currently available and more consistency of supply.

I look forward to MPI finalising the Import Health Standard to permit the alternative route of entry of fish to New Zealand, through pre-export isolation; and look forward to the improvements in fish supply commencing as soon as possible. This initiative has the potential to be the best thing that has happened to the ornamental fish industry in many years

#### **MPI Response**

MPI acknowledges support of the updated requirements from Aquagrow, no changes required.

### **3.12 John Walsby**

- 3.12.1 Offshore quarantine:** I am therefore writing to register my support for these proposed changes which I believe will also be of benefit to the local developing ornamental fish trade and raise New Zealand's reputation for ethical practice and improved fish welfare and for the protection of native fish species.

#### **MPI Response**

MPI acknowledges John Walsby's support of the updated requirements, no changes required.

### **3.13 Cam Scott**

- 3.13.1 Offshore quarantine:** My name is Cam Scott and I run an aquatic shop down here in Nelson, after reading the draft submission, I am in favor of off-shore quarantine- I think it will be a positive move for the hobby and my business.

#### **MPI Response**

MPI acknowledges Cam Scott's support of the updated requirements, no changes required.

### **3.14 Barry Mathews, Happy Fish Ltd**

- 3.14.1 Offshore quarantine:** Hi my Name is Barry Mathews I own and operate Happy Fish Ltd. I would like to support the draft Import Heath Standard for ornamental fish and invertebrates. I consider this to be good for the industry and well-being of fish care in New Zealand

#### **MPI Response**

MPI acknowledges Happy Fish Ltd.'s support of the updated requirements, no changes required.

### **3.15 Nikki Almond, Animates**

- 3.15.1 Offshore quarantine:** Animates supports the addition of an off-shore quarantine option to the import health standard. For details see appendix 1: copies of submissions.

#### **MPI Response**

MPI acknowledges Animates support of the updated requirements, no changes required.

---

### **3.16 Verity Forbes, Department of Conservation**

- 3.16.1 Scavenger snails and fish identification:** A key concern of the Department's is the biosecurity risk focus is exclusively on disease (prevalent throughout the three documents and specified as the only outcome of the IHS in 1.2). In our view, disease is not the only biosecurity risk associated with these imports. Other risks include organisms associated with this trade such as scavenger snails (see our earlier feedback to the Draft facility standard including the supporting publication) and mis-identification of species. We do not believe these risks have been addressed adequately in this draft IHS to date

#### **MPI Response**

MPI has noted DOC's previous submission on scavenger snails. This issue is covered in the review of submission for the draft facility standard for ornamental fish and marine invertebrates. Identification of ornamental fish and marine invertebrates can be difficult for MPI inspectors, and MPI has put into place several requirements to reduce the likelihood of non-approved species being imported into New Zealand. The new import health standard will only allow fish and marine invertebrates of an age sufficient to be identified (see clause 1.1.1 (1)a)i). Furthermore eligibility of hybrids is limited to hybrids approved by MPI. MPI has also contracted two fish identification hobbyists who are not associated with the import industry to aid with the identification of species on arrival. Where species cannot be verified as a species approved to be imported, they will be reshipped or humanely euthanised.

- 3.16.2 Risk analysis:** The Department does not have any in-house experts on piscis diseases and is unable to provide advice in this area, including whether the quarantine periods – 4 weeks for freshwater species and 3 weeks for marine fish and invertebrates (1.12) - are sufficient time for disease expression. We do question whether the Diagnostics testing and testing measures (p8) and surveillance measures (1.13(1)(h)) adequately cover latency risk? These tests seem to rely on clinical expression. In our lay-view we would expect death to come before disease is noted. Given our disease precincts, we suggest contacting Nicholas Dunn, a native fish expert and Thomas Simmonds, a trout expert, for advice on whether the disease analyses have been adequately identified and covered from their respective areas of expertise.

#### **MPI Response**

MPI has noted DOC's suggestion. However, the requirements listed in the IHS are based on science-based risk analyses of the potential hazards of imported ornamental fish and marine invertebrates. These risk analyses were written by technical experts, and consultation occurred prior to the issue of the current IHS for ornamental fish and marine invertebrates. These tests remain unchanged in the proposed IHS. The risk analyses are linked again here:

Ornamental Fish- Risk Analysis (November 2005)

<https://www.mpi.govt.nz/document-vault/2754>

Tropical, subtropical and temperate freshwater and marine ornamental fish and marine molluscs and crustaceans - Import risk analysis: Review of submissions on import risk analysis: Ornamental fish, and supplementary risk analysis (June 2009)

<https://www.mpi.govt.nz/document-vault/2753>

Tropical, subtropical and temperate freshwater and marine ornamental fish and marine molluscs and crustaceans - Import risk assessment review of submissions (May 2010)

<https://www.mpi.govt.nz/document-vault/2752>

- 3.16.3 Risk analysis:** The 2005 Import Risk Analysis (IRA) for Ornamental fish revealed 158 genera of imported animals had not been included in the IHS that were being imported. We understand these species and genera were identified from a DOC-commissioned study by McDowall and

NIWA and a survey of industry to determine which species were 'new organisms' (under HSNO Act). We assume only the organisms determined not new are the remaining species permitted for entry under this IHS.

**MPI Response**

This is correct. For additional information also see response 3.2.1

- 3.16.4 Threat of establishment:** In light of the above, MPI conducted a supplementary risk analysis on the 158 genera of aquatic animals and found a further six hazardous risk organisms. MPI limited the interpretation of 'high-risk' to those fish or marine invertebrates that are susceptible to one or more of the prescribed 18 diseases. MPI's interpretation of 'high risk' does not pertain to the risk of the actual aquatic organism itself. The Department considers this interpretation too restrictive to adequately manage the actual risks of these imports. We believe there are fish on the list that are of real threat to New Zealand's temperate waters (let alone to our geothermal ones). Given the extensive gap detected during the 2005 IRA development, we ask for MPI to consider assessment and management in this area; including considering Unwanted Organism status and inclusion in the National Pet Trade Accord for relevant risk species.

**MPI Response**

The supplementary risk analysis was conducted on genera that had gone through DOC and NIWA review (i.e. other than goldfish, all fish were considered tropical or subtropical and unable to establish a population in New Zealand – also see response 3.2.1). MPI is open to review the list of species if given details of specific ornamental fish species of concern to DOC, or the Pet Accord.

- 3.16.5 Offshore quarantine:** Currently there is a requirement for fish to be in New Zealand quarantine for 4 weeks and marine inverts for 3 weeks prior to going into pet stores. In 2015 MPI received a request to allow this quarantine to occur offshore so the animals could then be airfreighted directly to NZ pet stores, with no quarantine required on arrival in NZ. The quarantine procedures are not prescribed in detail, rather the emphasis is on the Competent Authority ensuring things are done well (1.13, IHS). Although MPI reserve the rights to inspect and audit these facilities at any time, we consider this arrangement not only puts an element of distance between the hygiene and management standards and control; but there also seems to be a lot of flexibility in how standards might be applied. If there is to be a detachment of the quarantine function for these imports, we would expect to see a robust auditing regime set up to ensure the same standards are adhered offshore as those within NZ.

**MPI Response**

Please see MPI's response 3.7.1 above.

- 3.16.6 Identification:** There are very few people in New Zealand who are familiar with aquarium fish identification beyond avid hobbyists. This poses a problem on the verification of species and hybrids. It also presents a problem on how the species and hybrids can be accurately married up with health status given inspectors are not required to inspect consignments, and may choose to check a sample (or not, as the case may be) (1.11). We are concerned this leaves quite a bit of room for error for both validating species identification and health status.

**MPI Response**

As mentioned previously identification of closely related species is very difficult. MPI has improved measures by only allowing fish and marine invertebrates of an age sufficient to be identified (see clause 1.1.1 (1a)i), limiting eligibility of hybrids to those approved by MPI and contracting two fish identification hobbyists to aid with the identification of species on arrival.

---



- 3.16.7 Equivalence:** We note MPI can approve different measures to those listed in the IHS, without publishing supportive material. This puts a heavy reliance on MPI a. negotiating country-specific standards that are considered equivalent to the standards in the IHS, and b. consistently using sound judgement in this area. The Department would expect acceptable and scientifically robust standards to be identified at the Import Risk Assessment stage rather than during negotiations.

**MPI Response**

Equivalences are an obligation under the World Trade Organization (WTO) Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) which was signed by New Zealand as a trade nation. Equivalence measure go through extensive science risk assessment and these are published and available for the public to view.

- 3.16.8 Threat of establishment:** All of the fish and marine invertebrates identified as susceptible to the 18 biosecurity risk diseases are tropical or sub-tropical. Ostensibly this looks to present a lower risk to NZ waters, except we understand some of the fish are temperate fish and their associated diseases could affect our native and naturalised fish. This relates to our point 5 above pertaining to the risks posed by the actual aquatic organism itself. We would expect to see some assessment and management around this area.

**MPI Response**

Please see response 3.16.4.

### **3.17 Nathan Hockly**

- 3.17.1 Temperate fish:** My concern is with the importation of Coldwater fish that disease may come in with them that will be transferred to our Native Species of coldwater fish and also potentially to the Trout fishery as well (although my first concern is with the native coldwater species). Also concerned that other potentially highly dangerous fish are on the list in a Latin form without a common name ie Piranaha etc.

**MPI Response**

Ornamental fish and marine invertebrates considered as eligible for import, under the Hazardous Substances and New Organisms (HSNO) Act, were those species present in New Zealand before 1 July 1998. This list was then assessed by the Department of Conservation (DOC), the National Institute of Water and Atmospheric Research (NIWA) and the Federation of New Zealand Aquatic Societies (FNZAS). Fish that are potentially harmful to New Zealand (i.e. able to survive in New Zealand and establish a self-sustaining population) were removed from the list. The amended eligible list was finalised in March 2007. All fish on the list, other than goldfish, were considered tropical or subtropical fish, and are the species listed in the import health standard. Diseases of those fish are managed as recommended by MPI's risk analyses. Piranha are not eligible for importation.

### **3.18 Murray Barker, Global Goldfish Ltd**

- 3.18.1 Goldfish:** Global Goldfish Ltd expressed concerns in regards to allowing goldfish from a third country to be sent to Australia for offshore quarantine and then being cleared at the border with no inspection at the point of entry in New Zealand.

Global Goldfish Ltd is especially concerned about the introduction of *Aeromonas salmonicida*, Koi Herpesvirus and Gold Fish Haematopoietic Necrosis Virus to New Zealand.

**MPI Response**

See response 3.7.1

---

The IHS includes risk mitigation measures for both *Aeromonas salmonicida* and Koi Herpesvirus. MPI assumes Global Goldfish Ltd is referring to herpesviral hematopoietic necrosis disease (Cyprinid herpesvirus 2) with regards to haematopoietic necrosis virus. Cyprinid herpesvirus 2 was not identified as a biosecurity hazard in the risk analysis due to its presence in New Zealand.

### **3.19 Alex Fleming, Fishwise**

- 3.19.1 Importation of Goldfish:** We have mixed views on allowing the (practical) importation of Goldfish into New Zealand. Due to the lack of diversity in genetic variation in Goldfish in NZ, importation of new fish is important to prevent further inbreeding (which prevents deformities and disease). However, Fishwise does not fully support the current size of the Goldfish keeping industry in New Zealand due to the poor conditions that Goldfish are frequently kept in – the importation of Goldfish may also allow for importation of *unhealthy* fish with deformities that affect lifespan and quality of life. We personally do not support the majority of “fancy” breeds, which is a main motivation for importers of Goldfish. For these reasons, we are predominantly neutral in terms of our support/opposition of this change.

#### **MPI Response**

The IHS is only able to address biosecurity risks and aspects of welfare related to travel. Under the Import Health Standard for Ornamental Fish and Marine Invertebrates from All Countries (FISORNIC.ALL), goldfish (*Carassius auratus*) have been eligible for importation. In order to import goldfish (a high risk species) the importer must provide test results, acceptable to MPI, demonstrating freedom from certain diseases of concern to New Zealand, that are listed in the import health standard under specified requirements for identified risk organisms. Goldfish have not been imported to date.

- 3.19.2 Allowance of Hybridized Fishes:** Although Fishkeepers may have differing opinions around the ethics of hybridized fish, we support the additions allowing for their importation. We feel that this is an important clarification that was needed in the Import Health Standard, and support this change.

#### **MPI Response**

MPI has revised the conditions for importing hybrids. Eligibility of hybrids of ornamental fish species and marine invertebrates must be approved by MPI prior to importation. If eligibility is approved, the hybrid must comply with the quarantine measures prescribed in this standard for both parent species. These changes were made to prevent non-approved fish species being imported.

- 3.19.3 Decrease of Visits for On-Shore Quarantine:** Provided that enforcement of current rules remains effective, we are in full support of decreasing the number of visits from MPI for On-Shore Quarantine, as this reduces costs for local import facilities and allows for healthy competition with PEI importers.

#### **MPI Response**

Noted. This will be included in the ROS for the draft facility standard for ornamental fish and marine invertebrates.

- 3.19.4 White spot parasite:** We would greatly appreciate it if there is more enforcement in preventing fish from being released from Quarantine with this parasite present.

#### **MPI Response**

*Ichthyophthirius multifiliis* is present in New Zealand and therefore is not considered a biosecurity risk, and cannot be regulated by the import health standard.

---

- 3.19.5 Prophylactic Medications:** We wish to reiterate our suggestion for allowing anthelmintic medications (such as Levamisole, Praziquantel or both) for On-Shore Quarantine.

**MPI Response**

The list of prophylactic treatments currently allowed in quarantine will be amended to include Fenbendazole, Levamisole and Praziquantel. These treatments have been reviewed by MPI's risk team, and do not have any effect on the ability to detect risk organisms.

- 3.19.6 Request to expand IHS Approved Species:** We have noticed that there has been two (or more) approved species for the Marine Ornamental Fish list, however there has been no expansion on the Freshwater Ornamental Fish list. We recognize that new organisms must go through the EPA, however it may be of interest to both MPI and organizations such as the Federation of New Zealand Aquatic Societies (FNZAS) or private companies to work towards correcting taxonomic changes, providing more "common names" for ease of use, and to also work towards expanding this list (as was previously done in 2006). However, we recognize that this requires a collective effort and is not within the intentions of the draft IHS.

**MPI Response**

Noted.

## **3.20 Kerry Hewitt**

- 3.20.1 Comment on IHS:** I support the proposed changes to the IHS for ornamental fish and invertebrates.

**MPI Response**

MPI acknowledges Kerry Hewitt's submission.

## **3.21 Kerry Hewitt, National Aquarium**

- 3.21.1 Comment on IHS:** The National aquarium supports the changes to the IHS for ornamental fish and invertebrates. We believe it will be beneficial for the fish keeping community and the networks which support and are supported by these fish keepers. It will make good quality ornamental fish available and encourage the education and knowledge around Aquatic habitats and needs.

**MPI Response**

MPI acknowledges National Aquarium's submission.

## **3.22 Timothy Brewerton**

- 3.22.1 Offshore quarantine:** One of the obvious large changes in the draft that I see is for the approval of some off shore quarantine facilities being able to complete the quarantine prior to a shop ordering direct with no need for NZ checks taking place. While I can see the positives of this in that it will potentially decrease the costs of bringing in some approved species that are currently not cost efficient to do so, I am concerned that this will result in an anti-competitive market and the potential for higher levels of compliance breaches.

**MPI Response**

---

Please see MPI's response 3.7.1 above.

- 3.22.2 Compliance Breaches:** One concern I have is that from my understanding of the draft once an offshore facility is approved they won't be monitored to the same level of degree that NZ quarantine facilities are currently subjected too. How will this be monitored to ensure that non approved species are not being sent through if there are no border checks in place or facility checks prior to each and every export to NZ? Australia in my opinion does not have a great track record in conservation and so what checks are going to be put in place to prevent them from sending unapproved specimens and possibly causing massive harm to our environment.

**MPI Response**

See 3.7.1 above.

- 3.22.3 Anti-Competitiveness:** As above, my second concern of this is the potential to create an anti-competitive environment which in turn could cause many smaller retailers as well as local importers to close. By allowing for bulk quarantine offshore this is naturally going to favour large retail chains over smaller shops. With larger retailers being able to get through bulk product this will drive down their costs and undercut our current market. While short term this would be great for hobbyists like myself, I can't see it being great long term as once the smaller shops and local importers have been pushed out due to an inability to compete – the prices will naturally start to increase again.

**MPI Response**

Any requested changes made to an IHS must ensure New Zealand meets its obligations under the WTO SPS agreement as well as the protection of New Zealand's biosecurity.

- 3.22.4 Importers:** I also cannot see any mention in the draft that would allow current importers to order through the off shore quarantine facilities as this is all worded towards retailers. Would there be provision for current importers to import through those facilities and be able to waive their quarantine process on those shipments like a retailer could?

**MPI Response**

Importers would have to discuss this with the offshore quarantine facility operators.

- 3.22.5 On-shore inspection:** As I understand the draft document states that for long standing importers (more than 10 years) they will no longer be required to have an inspection on stock arrival but instead just within 48 hours.

While I think it's great to see changes being discussed I feel that in their current state they may do more harm than good. I would like to see mechanisms put in place to ensure compliance if off shore quarantine is approved, while also creating a way for local importers and smaller retailers to also reduce their costs in order to compete on an even playing field through the rewarding of compliant facilities.

**MPI Response**

Noted. For further information see Part 2 'Other Amendments' of this document.

### **3.23 Alice Collins, The Big Fish Pet Supplies**

- 3.23.1 Offshore quarantine:** I would like to show my full support on behalf of The Big Fish Pet Supplies for the Risk Management Proposal. The changes in the system will contribute towards the future of the fish business in New Zealand.

**MPI Response**

MPI acknowledges the submission from The Big Fish Pet Supplies.

---

### **3.24 Brenda Chalmers, RetailNZ Trade Group**

#### **3.24.1 Support of IHS amendment**

##### **MPI Response**

MPI acknowledges RetailNZ Trade Group's submission.

### **3.25 Natasha Walsh**

#### **3.25.1 Off-shore quarantine: I have a 400L tank at home and would like to show my support for the risk management proposal for importing fish into New Zealand.**

I would like to see change in the industry and think it a good idea you are looking at making changes.

##### **MPI Response**

MPI acknowledges Natasha Walsh's submission.

### **3.26 Mark Paterson, Federation of New Zealand Aquatic Societies**

#### **3.26.1 Off shore quarantine: The changes proposed may allow for cheaper, reliable, more diverse range of species and more efficient forms of importation of ornamental fishes. This should help further the amount of people keeping fish as a hobby.**

##### **MPI Response**

Noted.

#### **3.26.2 It will allow for larger Pet Store chains to possibly create a monopoly based on their securing of off-shore quarantine facilities in Australia thus causing closure of many different businesses and their currently-running On-Shore facilities. It is felt this will ultimately lead to fewer harder to source species currently on the allowable import list being available to hobbyists.**

##### **MPI Response**

MPI acknowledges Mark Paterson's comment. No changes are needed.  
The IHS only addresses biosecurity issues.

#### **3.26.3 Thirdly is concerns based around animal welfare, based on the increased length of time in shipping involved with using an offshore facility as this may cause undue extra stress on the fish therefore increasing the possibility of disease or death on the animals involved.**

##### **MPI response**

The overall travel time for fish imported to New Zealand is similar whether they undergo quarantine prior to or on arrival. All travel must meet animal welfare standards.

#### **3.26.4 We understand that a change is necessary to bring New Zealand into line with other countries worldwide and will hopefully be an improvement on our current system while ensuring sustainable practises are followed in the industry from collection point to the end user. Owing to**

---

the difficulty of knowing which future outcome is likely we feel we can neither support nor oppose the proposed standard but feel there are some essentials that need to be taken into consideration on this matter.

Ensuring quality auditing of approved of Off-Shore facilities, preventing potential issues such as hidden diseases or misidentification of fish.

The health and wellbeing of the animals being imported according to our current Animal Welfare Act.

Providing a level “playing field” in the future standard that will be fair and equitable on current importers and all other related businesses in terms of costs and the practicalities of Off-Shore quarantine, preventing a monopoly created by larger companies.

#### **MPI response**

See MPI response 3.7.1. In regards to welfare, as mentioned above travel for offshore and onshore quarantine is not considered to be significantly different and both processes are required to meet animal welfare standards.

- 3.26.5 Part1:1.11.(1)e)ii). Weekly Visits for Off-Shore Quarantine** Provided that enforcement of current rules remains effective, we are in full support of weekly visits from MPI for On-Shore Quarantine, as this means compliance will be standardised for local import facilities and allows for healthy competition with PEI importers.

#### **MPI Response**

Noted, please also see the review of submissions for MPI's *Facility Standard: Ornamental fish and Marine Invertebrates*.

- 3.26.6 To create a standardisation between On-Shore and Off Shore Quarantine** the use of anthelmintic medications (such as Levamisole, Praziquantel or both) should be allowed by local import facilities as this allows fish to be treated for internal parasitic diseases helping ensure fish available to the hobbyist are parasite free at the same time as reducing risk of new parasites entering the country through the Aquatic trade. From feedback from our members it seems that currently certain species of fish (*Apistogramma* spp., *Otocinclus* spp., *Symphysodon* spp., *Tetraodontidae* family etc) come in to the country with internal parasitic infections which are frequently undiagnosed and can cause malnourishment and permanent damage to the fish's immune system leading to stress of the fish or death.

#### **MPI Response**

See MPI response 3.19.5. MPI-STD-TVTL will be updated as tests and treatments are assessed and approved by MPI as meeting the requirements of the import health standard, usually during certificate negotiation following these tests or treatments being proposed by the exporting Competent Authority. At the time the draft IHS went out for consultation, very few tests or treatments had been approved for use.

## **3.27 Trent Lloyd**

### **3.27.1 Offshore quarantine**

#### **MPI Response**

MPI acknowledges Trent Lloyd's submission.

---

### 3.28 Warren Garrett, Brooklands

- 3.28.1 HS codes: We also use the following HS code for live coral if you can add to the list: 0508 Coral and similar materials, unworked or simply prepared but not otherwise worked; shells of molluscs, crustaceans or echinoderms and cuttlebone, unworked or simply prepared but not cut to shape; powder and waste there of (is 0308 an actual code or is this a typo and meant to be 0508?)

#### MPI Response

Agreed and corrected.

- 3.28.2 Import permit: *(1) For ornamental fish and marine invertebrates described in 1.1.1(1)a)i and 1.1.1(1)a)ii) the consignment must arrive in New Zealand with a valid import permit issued by MPI (copy acceptable). The importer must supply the following information to obtain a permit: a) through to f)*

In reference to the Import Permit requirement to 1.1.1 (1)a)i) an annual multi-permit is accepted for NZ Transitional Facilities as outlined in 1.9. Unlike a single entry Import permit, when a multi Import permit is issued it is not a requirement nor is it possible to provide all of the information listed in 1.10.1(1) a-f.

The wording needs to be changed here to correct this statement.

#### MPI Response

Agreed and corrected.

- 3.28.3 Inspection and verification *(1)iii) The outer containers holding the containers of ornamental fish and marine invertebrates must be sealed with tamper-evident seals, such as MPI-approved tape or seal, to ensure that biosecurity is maintained between the place of first arrival and the transitional facility.*

The taping of the boxes by MPI staff at Auckland Airport remains an issue of contention for all importers. We are constantly told that the delays with the taping are due to lack of resources and staff at the airport. Generally our driver has to assist with the taping of the boxes as MPI staff are not allowed to lift the boxes on their own for health & safety reasons. It is ridiculous that we are often delayed for the sake of wrapping a strip of packing tape around each carton and then we often end up doing the job ourselves. Whether this packing tape would actually prevent tampering is questionable. MPI need to seriously review this requirement and ask what the benefits of taping these boxes is and if it does actually mitigate the risk. Otherwise MPI need to put better systems into place at the airport to ensure a more satisfactory level of service.

#### MPI Response

This is an operational issue that has been directed to border staff.

- 3.28.4 Inspection and verification: *(1) For ornamental fish and marine invertebrates described in 1.1.1 (1)a)ii): On arrival, all documentation accompanying the consignment must be verified by an Inspector. The Inspector may also inspect the consignment, or a sample of the consignment on arrival.*

For pre-export isolation why is a physical inspection of a sample of the consignment or whole consignment not mandatory at the border? The reason for this is most likely that there is a lack of trained MPI staff at the airport to carry out such checks, rather than mitigating the risk. It will also be difficult to identify species at the border as the water in the will be hard to differentiate from another. This means that MPI Inspectors will have to be even more vigilant in these circumstances to ensure that unwanted/illegal species are not either unwittingly or intentionally slipped in with these consignments.

---

This following statement is extremely vague and leaves the option to conduct physical checks wide open to interpretation; *The Inspector may also inspect the consignment, or a sample of the consignment on arrival.*

We accept that documentation will accompany each consignment which has been endorsed by an offshore authority, but only frequent physical checks can ensure that non-permitted species are slipping across the border with these consignments. If we take Australia as an example the list of fish they are permitted to import is quite different to the NZ permitted list and they also have many native species that are not allowed in NZ. They will be holding fish and invertebrates at their facility that are not allowed in NZ and either unintentionally or intentionally unwanted species may be included at the time of packing. Physical inspection of the fish is the only way to ensure that the fish sent comply with both the shipping documents and the IHS requirements. We have to remember that these fish will be going directly to pet stores or to private individuals here in NZ. MPI should be making mandatory physical inspections on fish received after Pre-export Quarantine into NZ to ensure that no unwanted species slip across the border.

#### **MPI Response**

The MPI exporting country systems and certification assessment process will ensure only approved species are being imported. MPI staff will be present to clear fish and marine invertebrates at the border and identification will be done as per the IHS. See MPI responses 3.7.1 and 3.7.2.

- 3.28.5 **Pre export isolation:** We understand that there is a large Australian importer planning to ship freshwater tropical fish and goldfish across to NZ in a bid to supply local pet shops. As far as we are aware there have been no goldfish imports over recent years and all of the NZ goldfish that you see in the pet shops are locally bred. Global Goldfish in Te Aroha breed a large percentage of the goldfish for the local market and have done so for many years (also known as Braeside). We would question why MPI are proposing to open up our borders to the import of a high risk temperate species for which MPI identify as many as seven hazards requiring mitigation in the current IHS? The Australian importers are importing huge volumes of goldfish every week from China which could also be destined for our border if this pre-export is approved. NZ importers have to date kept away from importing goldfish due to the fact that local breeders are supplying the market needs, as well as the large number of hazards requiring mitigation as outlined in the current IHS. The only way to make goldfish imports viable from an economic view is to import volume and there is no doubt that this is what the Australian supplier will be intending to do. Otherwise the costs associated with obtaining import permits, disease testing and other compliance costs would not be worthwhile.

Have MPI thought these issues through and do they have the resources to cope with 50 borders arriving into Auckland airport on the same day which would be destined for NZ retailers?

We can understand why offshore quarantine is a desirable option as in theory as it mitigates the risk of unwanted organisms or disease reaching our shores. We also have to consider the impact of this Pre-Export Isolation could potentially halve the business for NZ importers, most of who have a well-established and stable history supplying the local market. If a large Australian exporter was to move into our market and in a few years time this didn't prove to be economically viable they would simply walk away leaving our industry in ruins.

For these reasons we think that the pre-export quarantine option needs to be considered very carefully.

#### **MPI Response**

If Australia was approved to export ornamental fish that have already undergone biosecurity requirements, MPI would not be accepting Australia's quarantine requirements. MPI would be approving Australia to carry out quarantine requirements in Australian PEI that meet MPI's IHS. The length of

---



quarantine in an Australian PEI facility approved by the Australia Competent Authority, and tests and treatments that were carried out in PEI, would be the same as those required in a transitional facility in New Zealand. Also see 3.7.1 and 3.17.1

### **3.29 Josiah Pit, Aquarium Industries**

- 3.29.1 Aquarium Industries notes that at the time of consultation the document referenced in this section, namely MPI Approved Diagnostic Tests, vaccines, Treatments and Post-arrival Testing Laboratories for Animal Import Health Standards (MPI-STD-TVTL), had not been updated.**

#### **MPI Response**

MPI-STD-TVTL will be updated as tests and treatments are assessed and approved by MPI as meeting the requirements of the import health standard. This typically occurs during certificate negotiation following these tests or treatments being proposed by the exporting Competent Authority. At the time the draft IHS went out for consultation, very few tests or treatments had been approved for use.

- 3.29.2 Transparent packaging: Clause 1.8 refers to packaging being transparent. Aquarium Industries routinely uses packaging that is opaque on the sides to reduce stress to the fish, however on inversion of the packaging the fish are clearly visible. We suggest that this clause is amended to indicate that packaging should have an area of transparency sufficient to enable a visual inspection of the fish inside the package without having to open the packaging;**

#### **MPI Response**

Agreed and change made.

- 3.29.3 Import Permit: Aquarium Industries questions the need for an import permit to accompany every consignment, which is not consistent to the annual permit required for fish that are directed to transactional facilities in New Zealand.**

#### **MPI Response**

MPI uses permits to direct consignments to approved transitional facilities, but also to convey equivalence decisions to border staff, and to ensure that specialist veterinary inspectors are available at the correct time to ensure that live animals are checked and cleared as quickly as possible with no delays at the border. This will be particularly important for live fish, where there are no transitional facilities if fish cannot be immediately checked. Other 'booking' mechanisms may be considered in the future, but for this new trade (ornamental fish that will be cleared at the border) a permit for each consignment will initially be required, as agreed by MPI standards setting and operational staff.

- 3.29.4 Clause 1.10.1 details the information requirements for an import permit requires a list of scientific genus and species, number and origin of the ornamental fish in each container. This information would generally not be available at the time of application for an import permit under the PEI route for imports via the TF route for permits valid for one year.**

#### **MPI Response**

MPI agrees that the list of species in a planned consignment can be provided to MPI 72 hours in advance of a shipment, and the IHS has been amended to reflect this.

- 3.29.5 From a risk management perspective, the requirement for repeated import permit applications is an unnecessary burden on importer and MPI resources, when, once a PEI facility is approved it could be granted a yearly permission to import as per the TF route. This does not adversely impact risk as the risk management occurs either via pre-export quarantine and testing**
-

requirements plus 72 hour paperwork check, or 72 hour paperwork check plus post-import quarantine and testing requirements;

#### **MPI Response**

Facility approval is done as a Competent Authority assessment, following exporting country systems and certification assessment with MPI. Permits are to ensure that MPI border staff are available to facilitate clearance of consignments. See clause 3.29.4.

- 3.29.6 10. Guidance box at Clause 1.11 – the first dot point ends in an error; it refers to clause 1.10(5) which does not exist. It is suggested that this should be 1.10(3);**

#### **MPI Response**

Agreed and corrected.

- 3.29.7 Clause 1.13 (1) d iii requires that during PEI, the ornamental fish and marine invertebrates must remain free from clinical signs of disease. This should be amended or removed as the use of some treatments are permitted and therefore some basic health conditions may be seen and effectively treated with no risk to quarantine; in addition the risk management measures in Part 2 specify the clinical signs of concern. At which point testing may be carried out, and a batch may test clear of the risk organisms of concern in which case the remaining fish are still eligible for certification, providing they are clinically healthy at the time the health certificate is issued;**

#### **MPI Response**

This clause has been removed, as the intent (that if fish show signs that could be related to exotic disease, the batch is investigated) is met by other clauses.

- 3.29.8 Clause 1.13(1)d)v) specifies that “Other personnel may be granted access only where approval is given by the certifying official.” Aquarium Industries queries whether this would be an official of MPI or the Competent Authority of the exporting country? In addition, is this clause applicable to maintenance contractors etc.?**

#### **MPI Response**

The certifying official refers to the Competent Authority, and how contractors are managed would be agreed as part of the facility being approved under the IHS.

- 3.29.9 13. Clause 1.13(1)f)i) requires that the premises are emptied and thoroughly cleaned and disinfected before the commencement of each PEI. In reality, PEI processes will be ongoing on a continuous and overlapping basis and it is not practical to require a whole facility to be emptied and stood down when the same risk management can be achieved by ensuring the application of Clause 1.13(1)f)ii);**

#### **MPI Response**

This clause has been updated to read: In the event of a positive test result for a disease listed in Part 2 of this IHS:

- 1) The batch must be tested by an MPI-approved method and shown to be free of the relevant disease organism/s, or euthanised.
- 2) Protective clothing, packaging, tanks and equipment from the direct water system and any parts of the facility that are potentially contaminated must be thoroughly cleaned and disinfected or destroyed.

- 3.29.10 14. Clause 1.13(1)h)iii) states that “In the event of a positive test result for an exotic disease, all fish and marine invertebrates in the batch must be tested and shown to be free of the relevant disease organism/s, or euthanised (in which case testing is not mandatory)”. For clarity, since**
-

the PEI is not in New Zealand, we assume the intent is regarding diseases exotic to New Zealand, rather than exotic to the exporting country. It is suggested that this is clarified in the text and that the ability to treat for some of the identified risk organisms is also recognised. Such wording could read “In the event of a positive test result for an identified risk organism specified in Part 2, all fish and marine invertebrates in the batch are (1) treated in the manner specified in Part 2: Specified Requirements for Identified Risk Organisms where such treatment is permitted OR (2) all fish and marine invertebrates in the batch must be tested and shown to be free of the relevant disease organism/s, OR (3) all fish and marine invertebrates in the batch must be euthanised (in which case testing is not mandatory)”;

**MPI Response**

See 3.29.9 response. MPI considers that this amended clause includes the ability to treat for parasitic risk organisms, as the batch must be demonstrated free from identified risk organisms prior to export.

- 3.29.11 15. Clause 1.13(1)h)v) refers once again to the MPI Approved Diagnostic Tests, vaccines, Treatments and Post-arrival Testing Laboratories for Animal Import Health Standards (MPI-STD-TVTL) document. This needs to be updated prior to the commencement of the operation of this new import health standard;**

**MPI Response**

See 3.29.1

- 3.29.12 16. Once the PEI requirements have been met the fish are deemed to be ready for New Zealand import, but not all fish leaving PEI will be immediately packed for export. Aquarium Industries is committed to ensuring that we represent no elevated risk to New Zealand; as such we identified that the holding environment once PEI requirements are met is as important as the PEI quarantine itself, and that packing of tanks or part-tanks should not occur from within the PEI quarantine facility, but only once fish have moved out of the PEI quarantine facility, thus eliminating any risk of equipment cross contamination or error**

**MPI Response**

The IHS allows for fish not to be exported immediately, but ensures that they can only be kept with other fish that have completed PEI and remain isolated from non-tested fish prior to export.

- 3.29.13 17. Part 3: Model Health Certificate. Section (6) requires certification that the fish were kept in an MPI-approved facility. This suggests that facilities must apply to, and be approved by MPI before being eligible for PEI activities. Aquarium Industries queries whether the facility needs to be registered with the Competent Authority of the exporting country too; and suggests that this is required, but seeks clarification;**

**MPI Response**

The intention is that facilities are approved as per the process of exporting country systems and certification assessment. ‘MPI’ has been removed from this sentence.

- 3.29.14 18. Part 3: Model Health Certificate. Section (8). This section should be re-written as “Ornamental fish and marine invertebrates were identified as clinically healthy at the end of the pre-export isolation period.” to be consistent with Clause 1.13.(1).e.(iv) of the draft IHS;**

**MPI Response**

See 3.29.7.

---

- 3.29.15 19. Part 3: Model Health Certificate. Section (9). This section should be re-worded to be consistent with the suggested strengthened wording of Clause 1.13(1)h)vii) explained previously in this submission (point 17 above);

**MPI Response**

This change has been made.

- 3.29.16 20. Whilst the health certificate does indicate that fish species not listed in Schedule 3 (i.e. high risk fish and marine invertebrates) are not required to undergo the specific risk management measures indicated in Part 2: Specified Requirements for Identified Risk Organisms, the import health standard itself is not clear in the division and difference of quarantine requirements for those species listed in Schedule 3 as compared to those listed in Schedule 4 but not Schedule 3. It is suggested that the import health standard be amended to reflect that any individuals of those species listed in Schedule 4, but not Schedule 3, are eligible for importation to New Zealand as long as they survive the stated quarantine periods and can be certified as being clinically healthy at the time of export. This is alluded to in Clause 1.13(1)g)i) but is not explicit.

**MPI Response**

In general, fish that are not susceptible to the diseases of concern and are healthy at the end of PEI are eligible for clearance; however if high unexplained mortalities have occurred in the batch then the Competent Authority should contact MPI to seek clarification. This has been added to the IHS wording.

### 3.30 Peter Wilcox, Genesis Aquaculture

- 3.30.1 Definition of batch: In summary, the importer is in favour of the import health standard, but notes that *Carassius auratus* has high biosecurity requirements, and is concerned that the standard must be implemented properly for biosecurity to be maintained. One example is the definition of 'batch' in the IHS – which could mean that disease testing is carried out prior to all fish being exposed to a risk organism that was present.

**MPI Response**

MPI agrees that additional requirements should be placed on the definition of 'batch'; this has now been changed to - All ornamental fish or marine invertebrates sharing a direct water system and susceptibility to any specific risk organisms from Part 2 of the MPI Import Health Standard: Ornamental Fish and Marine Invertebrates. For the purposes of testing for specified risk organisms, testing must take place not less than 2 weeks after the last fish was introduced to the batch.

- 3.30.2 Offshore Facility Operating Procedures Manual: The facility operating procedures manual as applied by an offshore quarantine facility is not available for comment. As a result, NZ's biosecurity is at the mercy of how MPI enforce clause 1.1.1 ii) "*Have met the requirements of this standard prior to import*" with no transparency to interested parties. An offshore quarantine facility's operating procedures may be deemed commercially sensitive and therefore not publicly available for scrutiny to ensure that an 'equal playing field' is established between all quarantines importing fish into NZ. For the sake of current and future ornamental fish quarantine facilities supplying fish to NZ, we trust that the offshore quarantine providers operations manual will be made available upon request for the purposes of transparency and ensuring the requirements of the standard are met.

**MPI Response**

Ornamental fish will only be imported directly from countries that have undergone an exporting country systems and certification assessment, during which time MPI will assess that the Competent Authority is credible and trustworthy, and has regulatory oversight of pre-export isolation (PEI) facilities to ensure they are compliant with the IHS. MPI undertakes this biosecurity step in a very thorough manner. Trust in

---

Competent Authorities that have been approved to follow our IHSs and certify animals for export is an essential part of MPI's biosecurity system; without this there would not be any import or export trade. Approval of operating manuals would then be carried out by certified officials from the approved Competent Authority. Operating manuals are not required, either in PEI or onshore transitional facilities, to undergo public scrutiny.

- 3.30.3 Fish identification:** In the case of an offshore quarantine, if a vet is not present at the time of witnessing the fish being packed and box sealing, then certification of the contents of a shipment will be in doubt. Between the time a vet certifies a shipment for export and packing, there is a window during which the shipment can be tampered with by adding or changing fish. Detection of tampering is solely reliant on random testing of shipments upon border entry. Potentially with time this will become problematic apart from the fact that all shipments will not be checked within NZ.

**MPI Response**

Ornamental fish species will be certified as those approved in the IHS by an approved Competent Authority officer. MPI inspectors will check imported ornamental fish consignments at the border prior to their release.  
Also see 3.30.1.

- 3.30.4 With time, appropriately trained MPI staff will lose skills in identifying fish species and will not have the luxury of time to adequately assess the true identity of a species. The pressure will be on to get the shipment through the customs process as quickly as possible.**

**MPI Response**

MPI inspectors will do the same job they currently do, confirming the identity of imported approved ornamental fish species prior to their release from transitional facilities in New Zealand. In addition, under the new IHS, MPI inspectors will also be checking ornamental fish consignments (including species identification) that have undergone PEI requirements in an approved country, prior to their release at the border.

- 3.30.5 Verified Separation from Carp:** Should the mitigation option of 'Verified Separation from Carp' be implemented, then NZ farmers of goldfish, grass and silver carp will be totally reliant on MPI to ensure that certification will be valid. It is my preference that this option be removed and that all fish be batch tested where applicable. 'Verified Separation from Carp' is potentially open to interpretation and subject to misuse.

**MPI Response**

Where this option is approved as a risk mitigation option, it will because MPI has assessed and approved the Competent Authority systems that relate to this being officially certified, and MPI has assessed that biosecurity requirements in the IHS will be met. Also see 3.30.2.

- 3.30.6 General Issues surrounding an Australian Based Quarantine:** Finally, partnering with Australian Biosecurity at this time gives cause for concern based on feedback I have received from overseas ornamental fish suppliers. The change in Australian quarantine requirements for ornamental fish has caused multiple issues which it would seem Australian authorities choose to ignore or comprehend. The problems stem from the increased testing requirements for Australian ornamental fish imports and the pressure by Australia to get this testing done offshore. In this regard, Australia is unique. The result has been that most fish exporting countries outside of Asia have stopped exporting to Australia as it has just got too hard to deal with Australia biosecurity requirements. Ironically these are the countries with the least problems with disease and corruption is less prevalent. Australia is increasingly reliant on sourcing all of its ornamental fish from Asia where disease is more prevalent and corruption is more widespread and acceptable. Combine this with the push to get testing done offshore as Australia lacks
-

capacity to do all the testing required and a potential 'perfect storm' is brewing for Australia ornamental fish imports. While partnering with an Australian based quarantine will have its benefits, I trust we will not be caught in its problems. NZ Biosecurity needs to be vigilant that NZ ornamental fish imports do not get caught up with the flow on effects brought on by Australia's biosecurity changes especially as an Australian based company is not answerable directly under NZ law. Should it make a mistake, it cannot be held to account in a NZ court. It may lose it's ability to import into NZ but NZ bears all the consequences.

#### **MPI Response**

See MPI answer 3.28.5.

### **3.31 Arnja Dale, SPCA**

**3.31.1 The humane killing of ornamental fish and marine invertebrates:** The SPCA proposes that MPI-approved methods for the destruction of ornamental fish and marine invertebrates should be included in the IHS document. The inclusion of additional information should include the following

- Acceptable methods of humane destruction
- Who can conduct humane destruction (e.g only trained staff competent in the task)
- What equipment is to be used in the process
- How this equipment is cleaned, maintained and store, and why this is important (e.g. for proper functioning of the equipment)
- How often equipment cleaning and maintenance must occur (e.g. cleaning after each day it is used)
- How the animals will be handled and killed in order to ensure their welfare is not compromised.
- Required records of humane destruction (e.g. how many animals are killed, from which tank, why, when, by whom, by what methods, how they were disposed of and where)

#### **MPI Response**

If destruction of ornamental fish and marine invertebrates is required for biosecurity reasons, it is carried out following humane principles and current recommended animal welfare practice.

**3.31.2 Tests and vaccines:** The SPCA noted that the MPI document '*Approved Diagnostic Tests(s), Vaccines, Treatments, and Post-Arrival Testing Laboratories for Animal Import Health Standards*' as referenced in the draft import health standard does not yet document any diagnostic tests or vaccines that can be used for ornamental fish or marine invertebrates.

#### **MPI Response**

MPI-STD-TVTL will be updated as tests and treatments are assessed and approved by MPI as meeting the requirements of the import health standard, usually during certificate negotiation following these tests or treatments being proposed by the exporting Competent Authority. At the time the draft IHS went out for consultation, very few tests or treatments had been approved for use.

**3.31.3 Tank standards and groupings:** The SPCA strongly recommends that the Transitional Facility document includes specific guidance as to what standards the tanks used in facilities must meet.

#### **MPI Response**

The transitional facility standard is primarily concerned with biosecurity. For this reason animal welfare considerations are not explicitly documented. However, inspectors adhere to animal welfare best practices.

---

- 3.31.4 Permitted environmental conditions:** We feel that the Transitional Facility document lacks detail in regard to other environmental conditions that the animals can be kept in. For instance, there is no information in relation to how frequently inspections should be carried out and what each inspection should consist of, details of acceptable water quality levels, how water quality should be tested and when/how often, information regarding water and ambient temperatures, ventilation, lighting, feed type and frequency, noise levels and exposure to direct sunlight, as well as the actions that should be taken if issues are identified with any of these environmental factors. Substandard environmental conditions can increase the likelihood that the animals will become diseased (Francis-Floyd & Klinger, 2008; Huntingford et al., 2006; Li, Fu, & Duan, 2002; Morley, 2010) and directly impact their welfare.

Therefore, the SPCA would like to see information that regulates the environmental conditions of facilities housing ornamental fish and marine invertebrates added to the standards contained within the Transitional Facility document. As an example, it should be stated that all of the following aspects must be assessed for every animal in each tank during visual inspections:

- Body colour – has this changed?
- Body condition
- Gill condition
- Ventilation rates – are they normal, abnormally fast or abnormally slow?
- Other behaviour – e.g. hiding or grouping? If so, is this normal for the species?

Swimming behaviour

- Injury or damage, growths, lumps or lesions
- Feed consumption – has food been left or has it all been consumed?
- Slow growth – if the animals are still growing and if it can be observed during the time period that they are housed at the facility (Huntingford et al., 2006; Li et al., 2002)

**MPI Response**

See MPI Response 3.31.3

- 3.31.5 Record keeping:** The SPCA proposes that there should be an increased focus on the importance of record keeping and details added to the Transitional Facility document to outline what responsible record keeping involves.

**MPI Response**

Noted.

- 3.31.6 Veterinary and specialist support:** Each transitional facility should be required under the standards to have a good working relationship with a veterinarian or qualified expert who specialises in the care of ornamental fish and marine invertebrates, and who can be contacted for advice or to visit the facility when needed. Ideally, the veterinarian or expert would be approved by MPI to ensure that the care of the animals is overseen by a trusted, experienced and knowledgeable person.

**MPI Response**

MPI's verification staff are veterinarians and knowledgeable regarding ornamental fish health. The veterinarians are responsible for auditing the facility as well as ensuring import requirements are met and animal welfare standards are being met. MPI has also contracted two fish identification hobbyists where further advice is needed.

- 3.31.7 Separate areas for specific tasks:** The SPCA feels that the Transitional Facility standards should specify that separate areas are required within the facility for different purposes. For example, such designated areas should include separate spaces for humane destruction, the cleaning of equipment, packing/loading and feed storage. There should also be areas to separate animals
-

where their fundamental needs differ (e.g. cold-water, tropical, marine, freshwater and those requiring isolation) so that they can be housed separately in an environment that meets their needs.

#### **MPI Response**

All specifics are stated in the operating manual for the transitional facility. MPI veterinarians ensure that the manual meets the biosecurity requirements outlined in the facility standard.

- 3.31.8 Transport standards:** We would like to see detailed transport standards for the movement of ornamental fish and marine invertebrates included within both the IHS and the Transitional Facility document. If care is not taken during transportation, there is a significant risk of disease transmission between the animals (e.g. if the animals are not carefully transported from the point of importation to the transitional facility, non-diseased fish may come into contact with disease causing agents from diseased fish, for example via splashing of tank water, and potentially become diseased themselves).

Research also suggests that the transport process, especially the loading and unloading stages, can have a profound effect upon the stress levels of the animals. Whether acute or chronic, this stress can negatively impact upon the immune functioning of the animals, overall increasing their likelihood of contracting disease (Huntingford et al., 2006). The Animal Welfare (Transport within New Zealand) Code of Welfare does not include specific information on the transport of ornamental fish or marine invertebrates, especially where disease transmission is of a concern. There is a small amount of transportation information in the draft Transitional Facility standard but not enough. Information that should be given in both documents includes:

- The maximum length of time that the animals can be transported
- How they are loaded/unloaded into the transport vehicle
- The type of vehicle that is acceptable for transportation
- How they are kept whilst in the transport vehicle (e.g. that the tanks are tied down, can they be stacked, etc)
- When, where and how the animals are inspected during transit
- What vehicle temperature is acceptable
- How the animals are protected whilst being transported (e.g. how are they protected from direct sunlight?)

#### **MPI response**

MPI acknowledges the SPCA's submission. However, the above points lie outside the scope or regulation of the IHS and TF standard.

### **3.32 Greg, Fish 2 Water NZ**

- 3.32.1 Off-shore and on-shore quarantine:** Firstly, I am supportive of MPI's desire to help the ornamental fish industry grow and to get new genetics and fish into New Zealand. The next step is to review the allowed fish list and allow fish from the same family, area and conditions to be imported. Distinguishing down to the species and sub species level, in my view, unnecessarily restricts access to good specimens which pose no additional risk to New Zealand biodiversity. My main concern regarding the proposed changes is how the transitional facilities out of New Zealand will be monitored to ensure they meet the standards. It gives me some comfort that Australia is the only country to be allowed to quarantine in country, however, a robust QA framework should be in place. I believe they have notifiable diseases there we don't have here which would allow the export of fish to Europe via NZ. This in itself isn't an issue, however, it would be a loss for these diseases to make their way here should the Australian quarantine not stack up.
-



My other concern, which I am aware you can't control, is the impact of this set up on transitional facilities here in NZ. Pet shops with Australian ties will no doubt take advantage of this new set up, as they should, bringing in large quantities of the "bread and butter" species, making smaller importers un-competitive and therefore reducing the overall ability of the industry to bring in specialty species. I certainly hope this is not the case but I guess time will tell. A mitigation to this risk is the above suggestion around extending the allowed species list (to species which pose the same risk level as currently allowed) would allow specialty transitional facilities to retain a competitive advantage

Once again, overall I am supportive of what MPI is trying to achieve.

#### **MPI Response**

Noted.

### **3.33 Canadian Food Inspection Agency**

- 3.33.1 Disease freedom as a risk mitigation option:** Canada notes that certification for country, zone or compartment disease freedom is not specifically included as a risk mitigation option in the import health standard.

#### **MPI Response**

Country, zone or compartment disease freedom would be considered by MPI as an equivalent measure, and this option has now been included into the standard. Acceptance of this option for each risk organism would be discussed during exporting country systems and certification assessment.

- 3.33.2 Justification for pre-export isolation:** Canada notes that pre-export isolation conditions are applied to all animals regardless of their susceptibility to diseases of concern to New Zealand. Canada requests a copy of the risk assessment that New Zealand conducted that supports these measures.

#### **MPI Response**

The draft measures for pre-export isolation, including the length of quarantine, have been developed to be equivalent to the quarantine requirements for imported ornamental fish and marine invertebrates when risk mitigation is met in New Zealand under current import conditions. These measures are supported by risk analyses that have already been provided during the consultation period (links are included in the Risk Management Proposal).

### **3.34 Agri – Food and Veterinary Authority Singapore**

- 3.34.1 Justification for pre-export isolation:** Singapore seeks MPI's clarification on the rationale for the quarantine duration for these aquatic species, as well as if the quarantine duration can be considered for reduction wherever possible.

#### **MPI Response**

Please see 3.33.2

- 3.34.2 Frequency of certifying official visiting pre-export isolation facility:** Singapore pre-export consignments and facilities are frequently inspected by official inspectors who then inform our certifying officers of the status of the inspected consignments. As such, we propose that consideration may be taken with regard to inspectors and certifying officials of the Competent Authority working together to ensure that the exported consignments are healthy prior to export.
-

#### **MPI Response**

The visit arrangements outlined by Singapore meet the intent of the import standard, and would be a detail that would be discussed and agreed during the exporting country systems and certification assessment.

- 3.34.3 Testing of fish in the batch following a positive test result for an exotic disease: Clause 1.13 (h) iii states all fish and marine invertebrates in the batch must be tested in the event of a positive test result for an exotic disease and shown to be free of the relevant disease organism or euthanized. We would like to request for consideration of this point to be amended to “All fish and marine invertebrates in the batch cannot be exported to New Zealand in the event of a positive test result for an exotic disease”.**

#### **MPI Response**

Clause 1.11(g) iii) has been changed to:

- ii) In the event of a positive test result for an identified risk organism listed in Part 2 of this IHS:
  - 1) The batch must be tested by a test method approved by MPI and documented in the MPI-STD-TVTL and shown to be free of the relevant disease organism/s, or euthanised.
  - 2) Protective clothing, packaging, tanks and equipment from the direct water system and any parts of the facility that are potentially contaminated must be thoroughly cleaned and disinfected or destroyed.

- 3.34.4 Laboratory testing: Singapore notes; our laboratories currently do not carry out testings for some of the non OIE-listed diseases. As such, we would like to clarify if New Zealand would be able to accept exports based on other alternative measures based on discussions between the Competent Authority of the exporting country and the Chief Technical Officer (CTO) of MPI.**

#### **MPI Response**

MPI will consider and approve equivalent laboratories (for example, laboratories approved by other approved countries) as part of the exporting country systems and certification assessment process.

- 3.34.5 White spot syndrome: Singapore would like to clarify that the target species showing clinical signs of white spot syndrome or sudden unexplained mortality would be crustaceans instead of fish.**

#### **MPI Response**

MPI confirms that approved species in the IHS that are susceptible to white spot syndrome virus are crustaceans.

- 3.34.6 MPI approved tests: MPI approved tests for many diseases of concern listed in Part 2 of the document were not found. As such, we seek your assistance to provide the list of approved test methods for these diseases of concern.**

#### **MPI Response**

Only tests that have been previously approved by MPI and used to meet the requirements of the IHS are currently available. MPI will consider tests proposed by approved countries for the diseases of concern. Where test options are not shown in MPI-STD-TVTL, fish species susceptible to these diseases have not previously been imported to New Zealand.

- 3.34.7 Country approval: Singapore understands that with the implementation of these new requirements, approved species of ornamental fish and marine invertebrates listed in Schedule 4 may only be imported from a country where the Competent Authority has provided sufficient evidence to the satisfaction of the CTO in order for MPI and the Competent Authority of the exporting country to commence negotiation of country-specific health certification. While we**
-

**understand that the requirements are intended to be implemented on 17 October 2016, we would like to seek your kind understanding to delay the implementation of these requirements until clarifications with trading partners have been completed. We would also like to clarify if there would be any interim measures during the negotiation period to ensure that disruption of trade of ornamental fish and marine invertebrates during this period would be kept to a minimum.**

**MPI Response**

The amended import conditions will not disrupt trade in ornamental fish, as importation of approved species of ornamental fish and marine invertebrates from all countries followed by quarantine in transitional facilities in New Zealand will continue – these requirements remain unchanged from the existing import health standard.

The proposed IHS gives the additional option for countries to become approved by MPI to complete testing for diseases of concern during pre-export quarantine, which will enable ornamental fish and marine invertebrates to be imported without undergoing further quarantine procedures in New Zealand.

## 4 Copies of Submissions

### 4.1 Peter Willcox

Hi Maike,  
Thanks for the update. I look forward to seeing the revised IHS.

I must admit to some concern in regard to the batch definition as it doesn't take into account goldfish scenarios very well. For me I can see I could spend a lot of money to only receive a batch which I would have to treat extremely cautiously due to undetected disease. I can manage the risk myself if I am in end to end control of the quarantine process but if I am reliant on others then for me I would have to say that I am wasting my money as I am exposing myself to unreasonable risk. However, if I was to take responsibility for the quarantining of my fish then I would be at a competitive disadvantage as there would be no corner cutting to decrease costs. At least I would be able to sleep at night as long as I can make it work financially against lower cost competition.

Maybe the intention is to cover off the limitations in the definition by dealing with limitations in the batch testing protocols which are specific to each disease being tested. Is this a correct understanding or are we really facing the reality of making up batches by the combining of fish into a common body of water and saying they are now a batch and ready for testing?

Regards,  
Peter Willcox  
Mob: 0274 968 299  
Email: [willcoxfamily@clear.net.nz](mailto:willcoxfamily@clear.net.nz)

### 4.2 Henward Tan

**From:** Henward Tan [<mailto:henwardt@gmail.com>]  
**Sent:** Friday, 22 July 2016 12:33 p.m.  
**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>  
**Subject:** Risk management Proposal

To Whom It may concern,

Name: Henward Tan  
Title: Aquarium Hobbyist

I would like to make a submission on deciding on the species of which is allowable into NZ.

I would like to note that I believe your quarantine and standards are great, No issue there.  
The issue are the species in which that can enter the country.

Far too many species are not allowed to enter citing fears they could establish in the country, However, These animals are predominantly tropical and cannot survive cold climates.  
Examples, Pleco species require waters year around to be above 24c and NZ does not have waterways that get this warm in the best of summers.

Freshwater puffer fish as well require extremely warm waters to survive.

I would also like to state that fresh water sting rays should be able to come in, They require warm tropical waters but also are not dangerous to humans. Albeit having a sting, the sting is not deadly and causes minor irritation and the sting can be removed as well prior to entering the country.

---

### 4.3 Danial Logan, Reef Imports NZ

**From:** Reef Imports [<mailto:reefimportsanz@gmail.com>]

**Sent:** Saturday, 23 July 2016 3:18 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Importing ornamental fish and marine invertebrates submission

name : Daniel Logan

phone : 02216544

hi there my name is Daniel there are a few things that i would like to see changed about the importing of marine fish and corals one of these is i would like to see only fish that have bin breed in captivity and not taken off the worlds reefs as we are destroying the worlds roof in doing this

i would love to see the coral importing open up more there are a lot of corals that have bin in nz in the past that we are not able to bring in any more there are some thing that just dont make seance to me like why we are not able to bring in lion fish but in summer they are found off the top of the north island as well as i think the government should help support importers who are trying to better the availability of fish and corals for the next generation as the hobby is struggling coz of the tight import laws thank you for reading my email and hope you have a good day

yours sincerely Daniel Logan

---

## 4.4 Paul Decker, Mahurangi Technical Institute



**MAHURANGI**  
TECHNICAL INSTITUTE

THE PERFECT PLACE TO STUDY

Paul Decker  
Mahurangi Technical Institute  
PO Box 414  
Warkworth - 0941

29 July 2016

animal.imports@mpi.govt.nz

**Re; Draft Import Health Standard (IHS): Ornamental Fish and Marine Invertebrates**

I am the manager of a large aquaculture establishment located within Warkworth, Auckland. I have read the 'Draft – Import Health Standard: Ornamental Fish and Marine Invertebrates' which requests submissions.

I would like to express both my personal and that of my companies support for the draft IHS. In particular in support of the allowance for offshore transitional facilities (great concept).

It is my opinion that this particular IHS is long overdue and its implementation will allow our business to grow through better access to quality fish breeding stocks. It will increase our ability to have genetic diversification within our gold fish strains which currently suffer from inbreeding.

Our company's growth through the implementing of this IHS will have a direct flow on of not only increasing our own staffing levels but increasing the staffing requirements of our retailers.

I do question the "guidance box" section 1.9 which states;

*"Import permits will be valid for one year for consignments of ornamental fish and marine invertebrates described in 1.1.1(1)a)i) and for a single consignment only for ornamental fish and marine invertebrates described in 1.1.1(1)a)ii)."*

As NZ based TF operators require import permits on an annual basis therefore there is an anomaly and inequitable in offshore operators requiring one per consignment?.

Yours sincerely

Paul Decker  
Manager

## 4.5 David Cooper, Enterprise MIT

29 July 2016  
Ministry of Primary Industries  
animal.imports@mpi.govt.nz

Dar Sir/Madam,

Re; Import Health Standard: Ornamental Fish and Marine Invertebrates

EnterpriseMIT Ltd. is a wholly owned subsidiary of Manukau Technical Institute in Auckland. We deliver New Zealand's only qualification to the ornamental fish industry. Our students and graduates are employed in retail aquarium/pet stores, public aquariums, zoos, vet clinics and aquarium maintenance companies. We also offer consultancy services to the ornamental fish industry covering all aspects of the trade.

In addition I personally am heavily involved in the conservation of freshwater fishes in New Zealand and internationally and also in the area of animal welfare as it applies to ornamental fish.

I would like to express support for the draft IHS. I am particularly supportive of the fact that it will facilitate offshore quarantine of live fish and invertebrates.

This IHS will be a driver for economic growth in the ornamental fish industry. An improvement in professional standards and in animal welfare standards can also be expected as side benefits..

I do have a question though regarding section 1.9

"Import permits will be valid for one year for consignments of ornamental fish and marine invertebrates described in 1.1.1(1)a)i) and for a single consignment only for ornamental fish and marine invertebrates described in 1.1.1(1)a)ii). "

I wonder why NZ based Transitional Facility operators get permits on an annual basis while offshore operators need one per consignment. This seems unnecessary.

Thank you for the time and effort that has obviously gone in to this document.

Yours sincerely

David Cooper  
Special Projects Manager/Aquatics Tutor  
021 993 272  
[david.cooper@enterprisemit.com](mailto:david.cooper@enterprisemit.com)

## 4.6 Joseph Troost

**From:** Joseph Troost [<mailto:josephtroost@mail.com>]

**Sent:** Saturday, 30 July 2016 5:18 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:**

I'm concerned about the current restrictions on importing ornamental fish they seem to have been put in place by people with very little knowledge about where some of the fish come from for example african cichlids, they come from the great african lakes, Malawi, Tanganyika, and Victoria all the fish come from the same water source and yet we are only allowed to import a fraction of the species I can see no logical explanations to the ridiculous restrictions on importers, I have spoken to people from other countries who used to own pet shops and they are of the same opinion as well as probably everyone in the hobby of keeping ornamental fish we want to see more availability of different species in New Zealand and for you to make it less costly to import fish as the import costs far exceed that of other countries like America and Germany I don't no if it's a money making ploy or over use of buerocracy but it's ridiculous, sort it out please.

---

## 4.7 Cam Parsonson, Calibre Projects

**From:** cam parsonson [<mailto:calibreprojects@gmx.com>]

**Sent:** Wednesday, 3 August 2016 1:47 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Draft IHS ornamental fish & invertebrates

- Hi there,
  - We are about to establish a 200 tank import facility in Christchurch after losing our previous one pre-Christchurch earthquakes (meadowcroft fish farm - importers since 1971). We think that the new offshore quarantine clause within the draft standard makes a mockery of the past decades of successful quarantine and we are now questioning whether to proceed with our permit application.
  - The new IHS draft standard causes us concern on several fronts.
  - 1. The new draft standard for transitional facilities shows no clear thought has been given to natural hazards and strengthening the requirements for containment and management. Our new building has been designed with a bund cast in, capable of containment of 100% of lost water in an event. The tank stands will be bolted to the floor and have had bracing designed to improve resilience. We consider that the standard for facilities is still relatively low.
  - 2. We believe that certification of offshore quarantine will be haphazard at best and easily forged, falsified and subject to manipulation of quarantined species and duration. It is hard to visualise the difference between a modern fish production facility overseas and the transitional facility requirements detailed.
  - 3. We believe that vet certification and laboratory works overseas are also risky beyond doubt. Modification of documents etc is highly likely.
  - 4. Offshore Quarantine prior to shipment is moot without full laboratory testing for each species without exception. MPI seems to ignore the fact that it is the shipping that is the primary stressor that brings out the viral/bacterial infections that we see in quarantine. The fish can carry the virus, but only exhibits once its immune system has been compromised. The fish have been bred overseas and have attained full size and carry the virus. It is only once stressed that the virus emerges. We still own a retail fish store and we still regularly lose fish to viral infections etc post quarantine by other parties, which have survived the quarantine period, only to succumb when the next stressor allows the pathogen to take hold; when they arrive in our store after a short shipping from the north island.
  - 5. Offshore Quarantine will effectively deregulate the industry as pet stores can bypass onshore quarantine entirely. We see this as encouraging personal imports where people will try to bring in shipments themselves, encouraging risk taking and misdeclaration by more unscrupulous individuals as the ability to import directly will push desire for illegal species. Loading formal identification onto customs staff, rather than an inspecting veterinarian, will also cause more unapproved species to get in. We see this as a definite step in the wrong direction, as our view of quarantine is primarily the control of permitted species and government verification of such.
  - 6. Governmental culpability/liability for fallout relating to the standard changes and subsequent breaches. As MPI is a faceless government institution, we will see no CEO or managerial staff losing their jobs or facing reprimand for this decision and subsequent illegal imports or disease breaches if this standard goes live. It will also be difficult to control or penalise individuals & store importers as they could continue to import without a licensing requirement.
  - 7. We welcome the goldfish importation requirement, but this should be conditional on full virus testing of the species concerned without exception and the imports should be low volume imports allowed for introduction of breeding genetics to aid the new zealand goldfish industry NOT for general goldfish sales, as we see this as ongoing high risk behaviour.
  - regards,
  - Cameron & Heidi Parsonson
  - Meadowcroft Fish Farm
-



--



design • coordinate • construct

Environmental Testing and Remediation  
Renovations, Attic Stairs, Access Hatches

Cam Parsonson, M.Sc, LBP

021 351 900

[calibreprojects@gmx.com](mailto:calibreprojects@gmx.com)

#### 4.8 Sam Hurley

- From: samuel hurley [[mailto:sam\\_hurley@yahoo.com](mailto:sam_hurley@yahoo.com)]
- Sent: Saturday, 6 August 2016 8:20 a.m.
- To: Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>
- Subject: ornamental fish IHS
- 
- Hello,
- 
- I would like to support the changes to the IHS for ornamental and pet fish. I support the opening of the market, overseas quarantine, improved regulation that I feel will improve the welfare of the millions of fish kept as pets in NZ.
- 
- Sam Hurley
- BSc, BVSc, MAM

#### 4.9 Berni Pert, Pet Essentials Napier

**From:** Pet Essentials Napier [<mailto:admin@petessentialsnapier.co.nz>]  
**Sent:** Friday, 26 August 2016 3:58 p.m.  
**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>  
**Subject:** Import Health Standard ornamental fish and invertebrates

I support the proposed HIS because I believe that it will provide a stimulus and encourage economic growth in the NZ aquarium industry with consequentially more employment.  
It will lead to an improvement in the professional standards in the ornamental fish industry  
It will lead to better animal welfare outcomes for the 1.5 million live ornamental fish kept at any one time in NZ

Regards  
Berni Pert  
Pet Essentials Napier

#### 4.10 John and Tracey Drummond, Kamo Pet Shop

**From:** Kamo Pet Shop [<mailto:kamopetshop@xtra.co.nz>]  
**Sent:** Friday, 2 September 2016 10:53 a.m.  
**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>  
**Subject:** IHS - Import Health and Facility Standards

Good Day,

We are John and Tracey Drummond, the owners of Kamo Pet and Aquatic Centre in Whangarei.

We would like to express our support for the proposed IHS. We truly believe that this is a fantastic idea and will encourage a great increase in economic growth in New Zealand Aquatic industry, as well as more employment opportunities which is greatly needed.

By bringing forward this proposal we believe they will improve the standards and animal welfare outcomes for the ornamental fish industry. Health and well being is a major factor and concern in our opinion for the ornamental trade been imported into NZ. And knowing that these types of standards that are been proposed is a great feeling of improvement for all of us involved in this field we live and breath on a daily basis.

---

Thank you for the opportunity to express our opinions.

Kind Regards

Kamo Pets and Aquatic Centre

Tel : 09 - 435 3736

[kamopetshop@xtra.co.nz](mailto:kamopetshop@xtra.co.nz)

---

#### 4.11 Robert Hutton, Aquagrow



9 September 2016

Dear Sir/Madam,

I would like to make a submission supporting the **Ornamental Fish and Marine Invertebrates (ORNAMARI.ALL) Import Health Standard (IHS)** currently out for public consultation.

I am the owner and director of New Zealand Land-based Aquaculture Ltd which is based in Nelson but operates throughout New Zealand. Along with our sister companies Aquagrow Ltd and Aquaculture Services Ltd we offer a range of services in the aquaculture and ornamental fish market places. These include the production of goldfish and several species of tropical fish, the design, supply and installation of aquatic life support systems, the supply, installation and servicing of educational aquariums and the manufacture, supply and installation of aquaponic systems to commercial and domestic customers and in particular schools.

The fish keeping industry in New Zealand in all its various forms is currently constrained by a number of factors and there is demand, and scope for the industry to be much larger. In my opinion there is room to at least double the size of our industry and most likely even more.

There is very limited ornamental fish breeding in New Zealand currently and the cost of fish is high compared to the global market place. Similarly volumes of fish available are small and the range of species restricted. Whilst there is a relatively large list of species available for import, the reality is that few species are imported. The availability of live fish is a driving force for the sale of all the ancillary equipment and services required to keep them and that industry is many many times the size of the value of the fish trade alone.

Fish quality at present tends to be poor and inconsistent which is a constraining factor on our various businesses and I am certain on the wider industry.

I therefore support the introduction of pre-export isolation as an additional route to import fish as well as the current quite restricted post importation quarantine through the existing transitional facilities here in New Zealand.

The clauses in the draft IHS allowing offshore isolation will allow larger volumes of fish to safely enter New Zealand than is currently possible. This will result in:

- Cost efficiencies in the process that can mean more competitive prices for fish, benefitting the fish keeping hobby here in New Zealand.
- More fish will be available through the retail chains, which is of benefit to retailers, their employees and the industry at large.
- Fish are likely to be of better quality – larger importers have more buying power which will likely mean higher quality fish than is the case at present
- Better quality fish tend to represent a lower risk as they will be more likely be healthier and less likely to be carriers of disease.
- A wider range of fish than currently available and more consistency of supply.

I look forward to MPI finalising the Import Health Standard to permit the alternative route of entry of fish to New Zealand, through pre-export isolation; and look forward to the improvements in fish supply commencing as soon as possible. This initiative has the potential to be the best thing that has happened to the ornamental fish industry in many years!



Yours sincerely  
Robert Hutton  
Managing Director

[Aquagrow@hotmail.co.nz](mailto:Aquagrow@hotmail.co.nz)

022 3640118

---

## 4.12 John Walsby

**From:** John Walsby [<mailto:j.r.walsby@gmail.com>]

**Sent:** Monday, 5 September 2016 11:34 a.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Draft IHS & Facility standards for ornamental fish & marine invertebrates

Animal Imports Team. MPI.

Dear Sir,

I have recently learnt of proposed changes to the regulations for Import Health Standards for Ornamental fish and Marine invertebrates into New Zealand. I have a long time interest in this topic through my contract consultancy work as a marine biologist for over 40 years and as a tutor of aquatic biology and aquaculture at Mahurangi Technical Institute for over 20 years.

During this long involvement I have seen the need for changes to improve the industry standards and regulations covering import, quarantine and fish welfare for imported stock and can see considerable benefits to New Zealand's biosecurity and to animal health and safety so long as the quarantine procedures and conditions of entry and live-holding are carefully established and routinely monitored.

I am therefore writing to register my support for these proposed changes which I believe will also be of benefit to the local developing ornamental fish trade and raise New Zealand's reputation for ethical practice and improved fish welfare and for the protection of native fish species.

I would appreciate being kept informed of any progress in the implementation of the proposed improved standards and regulations.

Yours faithfully,  
Dr. John R. Walsby

Dr. John R. Walsby, Biologist  
P.O. Box 74, Leigh. 0947  
Ph. 09 4226389  
Email. [j.r.walsby@gmail.com](mailto:j.r.walsby@gmail.com)

## 4.13 Cam Scott

**From:** Cam Scott [<mailto:Cam-Scott@outlook.com>]

**Sent:** Thursday, 8 September 2016 2:06 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Draft import document

- Hi,
- My name is Cam Scott and I run an aquatic shop down here in Nelson, after reading the draft submission, I am in favor of off-shore quarantine- I think it will be a positive move for the hobby and my business.

Cam Scott

Fish keeper/owner of The Fish Room

Look up TFR on Facebook <https://www.facebook.com/pages/The-Fish-Room-TFR/1378729952416473>

We are also on Instagram TFR.Cam

Aquarium maintenance, hires and custom tanks available.

TFR promise- 'We WILL provide the cheapest fish in town'

---

#### 4.14 Barry Mathews

From: Allison Mathews [<mailto:alliem@xtra.co.nz>]

Sent: Tuesday, 13 September 2016 9:29 a.m.

To: Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

Subject: IHS Standards submission

- Hi my Name is Barry Mathews I own and operate Happy Fish Ltd
  - I would like to support the the draft Import Heath Standard for ornamental fish and invertebrates. I consider this to be good for the industry and well being of fish care in new Zealand.
  - My contact details are: 022 629 3117 or email [alliem@xtra.co.nz](mailto:alliem@xtra.co.nz)
  - With Thanks
  - Barry Mathews
-

## 4.15 Nikki Almond, Animates



Animates NZ Holdings Ltd.  
2 Robert Street, PO Box 11-959  
Ellerslie, Auckland 1051

14/05/2016

### Submission on Ornamental Fish and Marine Invertebrates Import Health Standard

To whom it may concern,

This submission regards the Ornamental Fish and Marine Invertebrates Import Health Standard currently out for public consultation.

At Animates, we have 34 retail stores throughout New Zealand, currently employing 342 FTE staff. The aquarium sector occupies a significant proportion of our business and is very important to us, not least due to the passion and enthusiasm of this particular customer group. It is particularly important to us that we ensure consistent, year-round access to high quality fish livestock. We currently rely on a small number of local breeders and importers for our fish and unfortunately we often see periods of low to no supply from these operators. As our business continues to grow, our stock requirements are now presenting a real challenge to our current suppliers and the unpredictability of supply is beginning to impact on our ability to meet customers' demands.

We support the introduction of pre-export isolation as an additional route to import fish outside of the current post-importations quarantine through the existing transitional facilities in New Zealand. Pre-export isolation should be facilitated by the Ministry for Primary Industries. We consider that pre-export isolation, when carried out in well-resourced facilities under the supervision of competent authorities of the exporting countries, means that biosecurity risk is dealt with before the fish come into New Zealand. This must be the preferred option and is consistent with MPI objectives of moving risks off shore.

Pre-export isolation would permit larger volumes of fish to enter New Zealand. For Animates, an increased volume of fish would be of immediate benefit, helping to fill current gaps in supply and ensuring consistent availability to our customers. This would help to support continuing sales growth within aquatics, reducing lost sales, creating new jobs and maintaining job security for our team members.

An increased volume of fish would also likely create cost efficiencies, resulting in more competitive retail prices for consumers, which would help to grow the hobby by removing the barriers to entry represented by high prices.

The buying power of larger importers is likely to result in an improvement in the overall quality of fish available in New Zealand. These better-quality fish are likely to be in excellent health, reducing the likelihood of their carrying illness. Healthier fish will also help to grow the fishkeeping hobby within New Zealand, as one of the main reasons that new fishkeepers give up on the hobby is the frustration caused by fish illness or death. Reducing the occurrence of such frustrations would have a significant effect on the growth of fishkeeping in New Zealand. We expect that pre-export isolation would also increase the range of fish currently available in New Zealand. Currently, we receive a number of requests from customers for fish that are legally permitted to enter New Zealand, but are not available due to New Zealand importers' choice not to import these. An expansion of the range available would reduce fishkeepers'





Animates NZ Holdings Ltd.  
2 Robert Street, PO Box 11-959  
Ellerslie, Auckland 1051

frustrations in being unable to source unusual fish. It would also add some much needed excitement to the hobby as fishkeepers encounter new and unfamiliar fish.

At Animates, we believe that the proposed changes to the Ornamental Fish and Marine Invertebrates Import Health Standard would allow us to continue expanding at our current rate of four to five new stores per year, with a significant number of new jobs created in New Zealand communities. We believe that the changes would improve the availability, quality and pricing of fish accessible to New Zealand consumers, thus helping to grow the fishkeeping hobby within New Zealand.

Please do not hesitate in contacting me should you require further information or clarification about the above.

Thank you,

Nikki Almond  
Aquatic Category Manager

## 4.16 Verity Forbes, Department of Conservation

16 September, 2016

Maike Thoene  
Animal Imports Regulation and Assurance Branch  
Ministry for Primary Industries  
Wellington

Dear Animal Imports Team

Re: DOC's feedback on the IHS for ornamental fish and marine invertebrates  
(Submission period closes 22 September 2016)

Thank you for the opportunity to comment on the Import Health Standard (IHS) for ornamental fish and marine invertebrates and the related consultation documents (below). Our comments follow.

- Draft import health standard (IHS) for ornamental fish and marine invertebrates
  - Draft facility standard for Ornamental fish and marine invertebrates
  - Risk management proposal
1. We ask that you consider our below comments to this IHS in conjunction with our earlier feedback to the Facility Standard for Ornamental Fish and Marine Invertebrates for holding un-cleared ornamental fish and marine invertebrate species (attached in cover email).
  2. A key concern of the Department's is the biosecurity risk focus is exclusively on disease (prevalent throughout the three documents and specified as the only outcome of the IHS in 1.2). In our view, disease is not the only biosecurity risk associated with these imports. Other risks include organisms associated with this trade such as scavenger snails (see our earlier feedback to the Draft facility standard including the supporting publication) and mis-identification of species. We do not believe these risks have been addressed adequately in this draft IHS to date.
  3. The Department does not have any in-house experts on piscis diseases and is unable to provide advice in this area, including whether the quarantine periods – 4 weeks for freshwater species and 3 weeks for marine fish and invertebrates (1.12) - are sufficient time for disease expression. We do question whether the Diagnostics testing and testing measures (p8) and surveillance measures (1.13(1)(h)) adequately cover latency risk? These tests seem to rely on clinical expression. In our lay-view we would expect death to come before disease is noted. Given our disease precincts, we suggest contacting Nicholas Dunn, a native fish expert and Thomas Simmonds, a trout expert, for advice on whether the disease analyses have been adequately identified and covered from their respective areas of expertise.
  4. The 2005 Import Risk Analysis (IRA) for Ornamental fish revealed 158 genera of imported animals had not been included in the IHS that were being imported. We understand these species and genera were identified from a DOC-commissioned study by McDowall and NIWA and a survey of industry to determine which species were 'new organisms' (under HSNO Act). We assume only the organisms determined not new are the remaining species permitted for entry under this IHS.
  5. In light of the above, MPI conducted a supplementary risk analysis on the 158 genera of aquatic animals and found a further six hazardous risk organisms. MPI limited the interpretation of 'high-risk' to those fish or marine invertebrates that are susceptible to one or more of the prescribed 18 diseases. MPI's interpretation of 'high risk' does not pertain to the risk of the actual aquatic organism itself. The Department considers this interpretation too restrictive to adequately manage the actual risks of these imports. We believe there are fish on the list that are of real threat to New
-

Zealand's temperate waters (let alone to our geothermal ones). Given the extensive gap detected during the 2005 IRA development, we ask for MPI to consider assessment and management in this area; including considering Unwanted Organism status and inclusion in the National Pet Trade Accord for relevant risk species.

6. Currently there is a requirement for fish to be in New Zealand quarantine for 4 weeks and marine inverts for 3 weeks prior to going into pet stores. In 2015 MPI received a request to allow this quarantine to occur offshore so the animals could then be airfreighted directly to NZ pet stores, with no quarantine required on arrival in NZ. The quarantine procedures are not prescribed in detail, rather the emphasis is on the Competent Authority ensuring things are done well (1.13, IHS).

Although MPI reserve the rights to inspect and audit these facilities at any time, we consider this arrangement not only puts an element of distance between the hygiene and management standards and control; but there also seems to be a lot of flexibility in how standards might be applied. If there is to be a detachment of the quarantine function for these imports, we would expect to see a robust auditing regime set up to ensure the same standards are adhered offshore as those within NZ.

7. There are very few people in New Zealand who are familiar with aquarium fish identification beyond avid hobbyists. This poses a problem on the verification of species and hybrids. It also presents a problem on how the species and hybrids can be accurately married up with health status given inspectors are not required to inspect consignments, and may choose to check a sample (or not, as the case may be) (1.11). We are concerned this leaves quite a bit of room for error for both validating species identification and health status.

8. We note MPI can approve different measures to those listed in the IHS, without publishing supportive material. This puts a heavy reliance on MPI a. negotiating country-specific standards that are considered equivalent to the standards in the IHS, and b. consistently using sound judgement in this area. The Department would expect acceptable and scientifically robust standards to be identified at the Import Risk Assessment stage rather than during negotiations.

9. All of the fish and marine invertebrates identified as susceptible to the 18 biosecurity risk diseases are tropical or sub-tropical. Ostensibly this looks to present a lower risk to NZ waters, except we understand some of the fish are temperate fish and their associated diseases could affect our native and naturalised fish. This relates to our point 5 above pertaining to the risks posed by the actual aquatic organism itself. We would expect to see some assessment and management around this area.

Thank you for considering our concerns. We look forward to your response.

Yours sincerely,

Verity Forbes

Technical Advisor - Biosecurity Threats (National) Kai-mātanga Matua, Koiora Mōrearea

Department of Conservation Te Papa Atawhai

---

## 4.17 Nathan Hockly

**From:** Nathan & Janene [<mailto:njhockly@farmside.co.nz>]

**Sent:** Monday, 19 September 2016 8:20 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Feedback on Draft import health standard (IHS) for ornamental fish and marine invertebrates

Make sure you include in your submission:

- Draft [import health standard \(IHS\) for ornamental fish and marine invertebrates](#)
- Name - Nathan Hockly
- submitting on behalf of myself
- Details - Nathan Hockly, 636 Crawford Rd, RD1 Tauranga, 07 5525585

My feedback is that it appears

### **Feedback - Goldfish has been snuck onto the list of species under its Latin name - *Carassius auratus***

My concern is with the importation of Coldwater fish that disease may come in with them that will be transferred to our Native Species of coldwater fish and also potentially to the Trout fishery as well (although my first concern is with the native coldwater species). Also concerned that other potentially highly dangerous fish are on the list in a Latin form without a common name ie Piranha etc

Thanks

Nathan Hockly

---

## 4.18 Murray Barker, Global Goldfish Ltd

**TITLE: IMPORTING ORNAMENTAL FISH AND MARINE INVERTEBRATES –  
DRAFT IHS AND DRAFT FACILITY STANDARD**

**MURRAY BARKER: GOLDFISH BREEDER**

**GLOBAL GOLDFISH LIMITED**

**PHONE: (07) 8849933 WORK: (07) 8848025**

**12 NGUTUMANGA ROAD, R.D. 3, TE AROHA 3393**

**aquatics@xtra.co.nz**

My name is Murray Barker, owner of Global Goldfish Limited (formerly trading as Braeside Aquaria), and wish to make a submission opposing the changing of the rules for the importation of goldfish into New Zealand.

I have been supplying the vast majority of the New Zealand goldfish market for the past thirty eight years and consider myself to be a significant stakeholder in this process.

I breed twenty five different varieties of goldfish. While I may not have all of the varieties for sale all of the time, I have most of the varieties, most of the time and over the years I have achieved a high degree of customer confidence and satisfaction.

In the mid 1990's I exported several shipments of goldfish to the Eastern Seaboard of Australia. I also exhibited my fish at Aquarama, an international ornamental fish show in Singapore, winning two awards. Not bad considering we were competing against the best in the world. It was also reassuring to know we had world class, disease free breeding stock.

To qualify for export status my premises and fish stock underwent rigorous inspection with numerous randomly selected fish being taken away for analysis.

The fish exported to Australia were inspected at their destination and quarantined for the statutory time.

The fish that were sent to Singapore were not allowed to return to New Zealand, despite their disease free status.

New Zealand has an enviable record of having the cleanest disease free status of water in the world so I can appreciate and understand the controls that have been put in place.

What I cannot understand is that given New Zealand's most enviable record, M.P.I. is considering changing the rules to allow goldfish from a third (fourth or fifth) country to be sent to Australia for a four week quarantine period, to then be despatched to final destinations at points all over New Zealand with no inspections at point of entry into New Zealand.

The main thrust of my opposition to goldfish importation is to do with atypical *Aeromonas Salmonicida*, goldfish ulcer disease. A nasty contagious disease that cannot be controlled in goldfish populations.

In the early to mid-1970's the New Zealand authorities banned the importation of goldfish. Australia chose to continue importing goldfish. In 1974 a shipment of goldfish imported from Japan to a Victorian goldfish farm arrived with the presence of atypical *Aeromonas Salmonicida* or also known as goldfish ulcer disease or furunculosis.

In the following three years goldfish ulcer disease found its way to four Australian States in despatches of diseased goldfish. G.U.D. then made its way into waterways and became enzootic.

In "The Aquatic Animal Diseases Significant To Australia. Identification Field Guide 4<sup>th</sup> edition" it states "Movement controls are now in place to prevent the spread of G.U.D to Western Australia and Tasmania". This site also gives an appreciation of the number of host species infected by G.U.D. and illustrates just how far the disease has spread in Australia.

If New Zealand authorities had not taken the very prudent action to ban goldfish imports in the early 1970's, there is a very high likelihood our waterways would have suffered the same demise as Australia's.

*In depth analysis of the arrival of goldfish infected with a Salomicida and its ongoing impact can be found on the site "Aeromonas Salmonicida Isolates from goldfish, Carrassium Auratus , Silver Perch, Bidhyansis Bidyanis – inter research" where the unfolding G.U.D. events in Australia lead the reader to the significant and concerning finding that despite a seven year gap, Silver Perch were infected by indistinguishable isolates of goldfish ulcer disease from diseased goldfish that were farmed on the same farm seven years previously.*

In the "Ornamental Fish Testing Project Final Report – Department of Agriculture 2009" under the heading "Areas of Concern". After reading this

section I was sufficiently concerned to attach it for you to read. It gives me no confidence in the process whatsoever.

If goldfish were to be exported to New Zealand, we, New Zealand, would be subjected to a widespread enzootic or epizootic sometime in the future as a direct result of this. Not if, but when.

My conviction of this was reinforced when I also read in the Final Report, of the arrival of goldfish with Haematopoietic Necrosis Virus in the early 2000's that compromises the immune system of goldfish and has a very high mortality amongst that species. It has not been able to be controlled and exists sub clinically in carrier fish. *The authors of the same "The Final Report, F.J. Stephens, J.B Jones and P. Hillier" make it quite clear there are severe inadequacies in the importation, testing and diagnosis of disease of goldfish coming into Australia.*

There is also no evidence that the stated origin of the fish is necessarily the case.

Many farms are a "Collection Point" from other farms prior to export to Australia. Testing, diagnosis and certification are often inaccurate and misleading.

In the Final Report of an audit carried out in China from 8th to 19<sup>th</sup> October 2012 in the Animal Health controls in Plac-Ueropa.ey", the Executive Summary clearly states the shortcomings of the implementation of the required provisions of export of ornamental fish into the E.U. It is precisely situations like this that can compromise and reduce dramatically the guarantees of compliance which in turn will lead to more translocation of diseases, which are already occurring globally because of situations like this.

At the Aquafind Aquatic Fish Database, Dallas E. Weaver, P. H.D in "The Importation of Diseases with Ornamental Fish: Problems and Risk Analysis" presents very sobering findings.

Although this article was written about the industry in North America, the source of all the problems go back to Asia.

Koi Herpes virus disease K.H.V. is a recent arrival on the world scene. A devastating disease. New Zealand is one of three countries in the world that is free of this disease.

---

The strain, CyHV3 that is so devastating to Koi, appears to not affect some other species. However, there are some reports that show CyHV3 can infect goldfish, and goldfish can be carriers of the disease without showing any signs of the disease. "ncbi.nlm.nih.gov Herpesviruses that infect fish, page 13".

In the "Oie regional workshop on emergency Aquatic Animal Diseases response, in collaboration with N.A.C.A. summary report page 25, No 4, "Mixed opinion on goldfish being carrier of K.H.V."

On page 17 Koi Herpes Virus: "A review and risk assessment of Indian Aquaculture ncbi.nlm.nih.gov states "Moreover, goldfish can also act as carrier to K.V.H."

Until the science can categorically state whether goldfish are carriers or not of this disease, this, by itself in my opinion is sufficient reason to not allow importation and wide dispersal of goldfish in N.Z. While it appears that much is already known about CyHV3, there may still be a few nasty surprises.

The two other diseases I have mentioned G.U.D and G.F.H.N.V are carried sub clinically by goldfish and are extremely difficult, if not impossible to detect.

When placed in conditions of stress, such as catching, processing for despatch and transportation, the conditions for infection of the other fish become propitious.

Given the concerns of many authorities and observers worldwide about the flawed quarantining in the ornamental fish industry, and its inability to prevent the translocation of deadly pathogens around the world, I am astounded that to think such an idea of mass export of goldfish to many sites New Zealand wide from Australia would even be contemplated.

What is even more astounding is that the goldfish would not be inspected at a central point on entry before delivery.

We are an island nation. Up until now we have had a robust border security backed by sound legislation. This goes a long way to explain our enviable record of non-detection of diseases that are found in most other parts of the world.

In dollar terms, the goldfish industry is paltry when compared with our food fish industry and our recreational fishing industry which is attracting tens of millions of production and tourism dollars per annum.

---



---

In my opinion, the risk, however minimal, is just not worth contemplating to satisfy the desires of a lobby group wanting to export goldfish to New Zealand as opposed to the risk, (however minimal) to two large industries.

*The ubiquitous goldfish is a vector that has the potential to unleash, New Zealand wide, almost overnight an event that New Zealand has not seen nor would want to see, if M.P.I. were to implement a policy of importing goldfish from Australia direct to New Zealand shops.*

*Thank you  
Murray Barker*

---

## Areas of concern

1. The Import Risk Analysis for gouramis and cichlids, especially in relation to EUS and Megalocytovirus (iridovirus) would appear to be in need of review in the light of recent publications and the results of this project.
2. In several laboratories there were no pathologists with specialised training in diagnosis of aquatic diseases and pathogens. This means that diseases entering Australia may be misdiagnosed, but it is highly probable that overseas veterinary pathologists are also struggling to interpret aquatic pathologies. Australia is not well placed to withstand scrutiny of routine aquatic veterinary diagnostic capability by overseas auditors.
3. At present, diagnostic techniques, sampling protocols and treatment methods are not specified for diseases for which management strategies and health certificates are required. Under the current Import Conditions (ICON) database these includes goldfish haematopoietic necrosis virus, *Dactylogyrus extensus*, *D. vastator* and *Aeromonas salmonicida* (atypical strain). The importation of asymptomatic carriers of disease will continue to be a problem until robust, rapid diagnostic techniques preferably based on PCR (for viruses) are developed and used as a basis of health certification.
4. Kahn *et al.* 1999, p.119. recommended that the Competent Authority, in countries producing large numbers of goldfish that are imported into Australia, should be audited. This audit process may need to be reviewed given that GFHNV is now in Australia and that fish are entering with dactylogyrid –like parasites.
5. Prior to this survey it would appear that testing of imported fish at the point of entry was rarely undertaken in Australia. Increase testing of batches of ornamental fish that suffer high mortality in quarantine and the provision of instructions to officers and laboratories on how to manage these batches after diagnosis would be useful.

## 4.19 Alex Fleming, Fishwise

**From:** Alex Fleming [<mailto:info@fishwise.co.nz>]

**Sent:** Tuesday, 20 September 2016 2:36 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Submission: Import Health Standard: Ornamental Fish and Marine Invertebrates

**Dear MPI,**

My name is Alex Fleming and I represent Fishwise Ltd, which is a distributor for aquarium products and aims at developing education for the Fishkeeping industry. We specialize in Freshwater fish, and therefore are unable to comment on Marine-specific changes. We have not previously made any submissions to MPI in regards to draft standards, so I apologise if this is poorly structured in regards to how submissions are typically made.

This submission relies on our previous correspondence and the answers from MPI being accurate, as they strongly influence our views on the draft standard. We have previously corresponded around topics including: Clarifying Quarantine types, the countries involved in Off-Shore Quarantine, the allowance of both On-Shore and Off-Shore Quarantine, and miscellaneous subjects such as diseases and prophylactic medications.

### Off-Shore Quarantine (Pre-Export Isolation, 1.13)

The draft standard provided has caused what could be called a “divide” in the community in how this will affect the future of fishkeeping – with this, we have also struggled to come up with our own views on the proposal due to the many potential outcomes of this standard.

The changes proposed may allow for cheaper, reliable and more efficient forms of importation of ornamental fishes – however, it may instead allow for larger “corporations” to create a monopoly based on their securing of off-shore quarantine facilities in Australia. The former could significantly increase the number of fishkeepers in New Zealand, whilst the latter may cause closure of many different businesses and their currently-running On-Shore facilities.

Because it is so difficult to know which outcome is likely, it is difficult to either support or oppose the proposed standard. Due to this difficulty, we will instead list what we feel is essential for this standard to have a positive effect on the Fishkeeping industry in NZ.

1. Healthy fish are absolutely necessary for the ornamental fish trade in NZ, and it is well known that Quarantine can either increase health, or cause excess stress (and thus disease). While Fishkeepers may have knowledge of the quality of Quarantine in New Zealand, it is difficult for us to know of the quality of Quarantine in Australia (or other PEI facilities). We trust MPI will be vigilant in enforcing quality Quarantine in Off-Shore facilities, preventing potential issues such as hidden diseases or misidentification of fish.
  2. We feel it is important that the future standard will be fair on all types of business sizes in terms of costs and the practicalities of Off-Shore quarantine, preventing a monopoly created by larger companies.
-

3. We understand that change is important and will hopefully be an improvement on our current system – because of this, we understand that there may be a negative effect on current importers as Off-Shore quarantine may prove to be more efficient and cost-effective. However, we feel that it is important that MPI opens up PEI facilities in other countries and perhaps reduces costs for On-Shore facilities in order to compete. This is partially to allow different businesses to compete fairly, but is also to prevent New Zealand from being restricted to Australia's imported species of fish if Off-Shore Quarantine proves to be more effective.

Provided the “playing field” is even for many different businesses around New Zealand, we feel that the proposed changes will hopefully be positive ones for the Fishkeeping industry, and may provide more diversity, positive competition, efficiency, health and cost-effective fishkeeping.

## **Importation of Goldfish (5.2.2, Risk Management Proposal for Ornamental Fish and Marine Invertebrates)**

We have mixed views on allowing the (practical) importation of Goldfish into New Zealand. Due to the lack of diversity in genetic variation in Goldfish in NZ, importation of new fish is important to prevent further inbreeding (which prevents deformities and disease). However, Fishwise does not fully support the current size of the Goldfish keeping industry in New Zealand due to the poor conditions that Goldfish are frequently kept in – the importation of Goldfish may also allow for importation of *unhealthy* fish with deformities that affect lifespan and quality of life. We personally do not support the majority of “fancy” breeds, which is a main motivation for importers of Goldfish. For these reasons, we are predominantly neutral in terms of our support/opposition of this change.

## **Allowance of Hybridized Fishes (1.1.1 (2))**

Although Fishkeepers may have differing opinions around the ethics of hybridized fish, we support the additions allowing for their importation. We feel that this is an important clarification that was needed in the Import Health Standard, and support this change.

## **Decrease of Visits for On-Shore Quarantine (3.11.1 (1), Facility Standards for Ornamental Fish and Marine Invertebrates)**

Provided that enforcement of current rules remains effective, we are in full support of decreasing the number of visits from MPI for On-Shore Quarantine, as this reduces costs for local import facilities and allows for healthy competition with PEI importers.

---

## Miscellaneous

As per our correspondence with MPI, we would like to suggest the following two changes/implementations:

### White Spot Parasite

We recognize that the White Spot Parasite (*Ichthyophthirius multifiliis*) is currently present in New Zealand and may not pose a significant risk to our ecology. Because of this, we recognize that it is unlikely to be added to the “high risk” category of diseases. However, as it is a parasite that has been shown to require introduction (and is not “always present” as suggested in common myths), and is also relatively easy to treat within a 4-week Quarantine, we would greatly appreciate it if there is more enforcement in preventing fish from being released from Quarantine with this parasite present.

While this parasite may not pose a significant risk to our ecology in NZ waterways, it does pose a significant risk to Fishkeepers and the fish infected with the parasite. As this parasite must be introduced, it may cause significant mortality rates in fish sharing the same water/tanks as those introducing the parasite. The prolonged exposure to this parasite (rather than treatment in Quarantine) could also be seen as inhumane.

Sources for White Spot Parasite lifecycle:

**Fish diseases -, Volume 1 - Wilhelm Schäperclaus - Page 253 -**

<https://books.google.co.nz/books?id=Uhxo48x2BCoC&lpg=PA242&ots=XPQg11LoWD&dq=Wilhelm%20Schaperclaus%20Ichthyophthirius&pg=PA253#v=onepage&q=Wilhelm%20Schaperclaus%20Ichthyophthirius&f=true>

**Ichthyophthirius multifiliis (White Spot) Infections in Fish - Ruth Francis-Floyd and Peggy Reed**

<https://edis.ifas.ufl.edu/fa006>

**Fish Disease: Diagnosis and Treatment - Edward J. Noga - Page 131, Problem 20: Ich Infection**

### Prophylactic Medications

It appears that increasing the list of prophylactic medications allowed for On-Shore Quarantine may currently be of interest to MPI due to the use of these medications in PEI Facilities, however we wish to reiterate our suggestion for allowing anthelmintic medications (such as *Levamisole*, *Praziquantel* or both) for On-Shore Quarantine.

It is very common for certain species of fish (*Apistogramma* spp., *Otocinclus* spp., *Symphysodon* spp., *Tetraodontidae* family etc) to come in to the country with internal parasitic infections which are frequently undiagnosed and lead to the wasting away of the fish. This means that once the fish has left Quarantine, it often then enters the retail outlets (and then the consumer's home) severely malnourished and often with permanent damage.

The current list of prophylactic medications approved for use does not contain any anthelmintic medications that are suitable for use against these common internal parasites. We feel that the use of anthelmintic medications in Quarantine will *reduce* the amount of medications used in the Fishkeepers' home (as the fish will ideally be free of parasitic infections before they are released) and will prevent unnecessary suffering and death of fish.

---

The two medications readily available in New Zealand are *Levamisole* and *Praziquantel*, however *Flubendazole* may be considered more effective. *Metronidazole* is suitable for severe cases, however we would obviously not recommend this as a prophylactic measure due to being an Antibiotic.

## Expansion of the IHS Approved Species

We have noticed that there has been two (or more) approved species for the Marine Ornamental Fish list, however there has been no expansion on the Freshwater Ornamental Fish list. We recognize that new organisms must go through the EPA, however it may be of interest to both MPI and organizations such as the Federation of New Zealand Aquatic Societies (FNZAS) or private companies to work towards correcting taxonomic changes, providing more “common names” for ease of use, and to also work towards expanding this list (as was previously done in 2006). However, we recognize that this requires a collective effort and is not within the intentions of the draft IHS.

## Conclusion

I personally greatly appreciate the work that is being done towards making change in the hobby and hope this change will be a positive one. I apologise for not being able to comment on more specific matters, however it is difficult to do so when there are several potential outcomes.

Please let me know if there is anything here that requires clarifying or if you have any questions at [info@fishwise.co.nz](mailto:info@fishwise.co.nz)

Many thanks for your consideration,  
Alex Fleming

--



Alex Fleming / Director  
[info@fishwise.co.nz](mailto:info@fishwise.co.nz) / 021927744

Fishwise Ltd  
[fishwise.co.nz](http://fishwise.co.nz)

---

## 4.20 Kerry Hewitt

**From:** Kerry Hewitt [<mailto:fishbaitnz@gmail.com>]  
**Sent:** Wednesday, 21 September 2016 3:57 p.m.  
**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>  
**Subject:** Ihs for ornamental fish

- I support the proposed changes to the ihs for ornamental fish and invertebrates.
  - Regards
- Kerry Hewitt

## 4.21 Kerry Hewitt, National Aquarium

**From:** Kerry Hewitt [<mailto:kerry@nationalaquarium.co.nz>]  
**Sent:** Wednesday, 21 September 2016 4:06 p.m.  
**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>  
**Subject:** IHS for ornamental fish and invertebrates

To Whom it may concern

The National aquarium supports the changes to the IHS for ornamental fish and invertebrates. We believe it will be beneficial for the fish keeping community and the networks which support and are supported by these fish keepers. It will make good quality ornamental fish available and encourage the education and knowledge around Aquatic habitats and needs.

Yours sincerely

**Kerry Hewitt**

CURATOR OF EXHIBITS & RECORDS KEEPER

Marine Parade, Private Bag 6010, Napier 4110

Phone 06 834 1404 Mobile 0272 450 664 Fax 06 833 7631

[kerry@nationalaquarium.co.nz](mailto:kerry@nationalaquarium.co.nz) [www.nationalaquarium.co.nz](http://www.nationalaquarium.co.nz)



## 4.22 Timothy Brewerton

**From:** Timothy Brewerton [<mailto:tbrewerton@gmail.com>]

**Sent:** Wednesday, 21 September 2016 11:24 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Importing ornamental fish and marine invertebrates – draft IHS and draft facility standard

# Importing ornamental fish and marine invertebrates – draft IHS and draft facility standard

- - My Name: Timothy Brewerton
  - Contact Address: [tbrewerton@gmail.com](mailto:tbrewerton@gmail.com)
  - Phone 021 357 036
  - 
  - Firstly I would like to thank you for the opportunity to make a submission on the draft IHS and facility standard. While I am not an importer or retailer and may find some of the terminology and points in these documents harder to understand I have done my best to gain understanding through discussion with other hobbyists, retailers and current importers. The views below I have come to from these discussions and are not necessarily representation of the above mentioned groups.
  - **Pre Export Isolation:** One of the obvious large changes in the draft that I see is for the approval of some off shore quarantine facilities being able to complete the quarantine prior to a shop ordering direct with no need for NZ checks taking place. While I can see the positives of this in that it will potentially decrease the costs of bringing in some approved species that are currently not cost efficient to do so, I am concerned that this will result in an anti-competitive market and the potential for higher levels of compliance breaches.
  - **Compliance Breaches:** One concern I have is that from my understanding of the draft once an offshore facility is approved they won't be monitored to the same level of degree that NZ quarantine facilities are currently subjected too. How will this be monitored to ensure that non approved species are not being sent through if there are no border checks in place or facility checks prior to each and every export to NZ? Australia in my opinion does not have a great track record in conservation and so what checks are going to be put in place to prevent them from sending unapproved specimens and possibly causing massive harm to our environment.
  - **Anti-Competitiveness:** As above, my second concern of this is the potential to create an anti-competitive environment which in turn could cause many smaller retailers as well as local importers to close. By allowing for bulk quarantine offshore this is naturally going to favour large retail chains over smaller shops. With larger retailers being able to get through bulk product this will drive down their costs and undercut our current market. While short term this would be great for hobbyists like myself, I can't see it being great long term as once the smaller shops and local importers have been pushed out due to an inability to compete – the prices will naturally start to increase again.
  - **Importers:** I also can not see any mention in the draft that would allow current importers to order through the off shore quarantine facilities as this is all worded towards retailers. Would there be provision for current importers to import through those facilities and be able to waive their quarantine process on those shipments like a retailer could?
  - **Solution:** As mentioned above I can see some merits in this process but in its current form it worries me greatly. I think more checks need to be included, even if it was for border checks of imports to verify stock prior to the on shipping to retailers. I also think more could be done for the local importers in order to enable them to compete on an even playing field.
  - **Importing:** As I understand the draft document states that for long standing importers (more than 10 years) they will no longer be required to have an inspection on stock arrival but instead just within 48 hours. While I understand this will help MPI as you wouldn't need to be on call for these imports, it does nothing to reduce costs for the importer. I fully understand and agree with the need for proper quarantine and checks being in place for importing of anything into the country but do think that processes could be put in place to reward importers who are compliant while dis-incentivising those who are not playing by the rules.
-



- In almost all other areas of NZ compliance we see the above played out. With the new Food Safety plans for restaurants it rewards compliant sites with fewer visits while those that are not meeting the standards have higher levels of visits which in turn increases their compliance costs. This is seen for so many aspects including importers of containers, cars etc.
- What if we were to reward compliant quarantine facilities by reducing the required visits from MPI? At the end of the day an approved facility is approved due to the standards they have presented to you for compliance and if its ok for the Australian facilities to only be audited periodically then why is it not ok for our local importers too. By doing this it would allow compliant facilities to reduce their costs over time if they remain compliant which would then in turn allow them to compete on a much more level playing field with off shore approved facilities. I don't think this should be based on the time that the importer has been importing for but should be purely based off their track record.
- **Summary:** While I think it's great to see changes being discussed I feel that in their current state they may do more harm than good. I would like to see mechanisms put in place to ensure compliance if off shore quarantine is approved, while also creating a way for local importers and smaller retailers to also reduce their costs in order to compete on an even playing field through the rewarding of compliant facilities.
- 
- I really appreciate your time in reviewing my submission and look forward to seeing the final outcome,
- Kind Regards,
- Tim Brewerton

#### 4.23 Alice Collins, The Big Fish Pet Supplies

**From:** The Big F [<mailto:thebigf2016@gmail.com>]

**Sent:** Thursday, 22 September 2016 1:22 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Risk Mangament Proposal MPI

Hi My Name is Alice Collins, Director of The Big Fish Pet Supplies (the big f limited)

Address is 19 fairbank road Rotorua, 0278432443

I would like to show my full support on behalf of The Big Fish Pet Supplies for the Risk Management Proposal.

The changes in the system will contribute towards the future of the fish business in New Zealand.

Thank you for taking our opinion into consideration.

Alice Collins, The Big Fish Pet Supplies

## 4.24 Brenda Chalmers, RetailNZ Trade Group



12<sup>th</sup> September 2016

Ministry for Primary Industries (MPI)  
Regulation & Assurance Branch Animal Imports  
PO Box 2526  
**WELLINGTON 6140**

**Email:** [animalimports@mpi.govt.nz](mailto:animalimports@mpi.govt.nz)

Dear Sir

### **Ornamental Fish and Marine Invertebrates (ORNAMARI.ALL) Import Health Standard (HIS)**

The Pet Industry Association (PIA) is an industry trade organisation within Retail NZ representing its members specialising in the supply and distribution of pets, products and services in New Zealand. The PIA has an elected Executive Committee that works on behalf of its members to help raise professionalism, maintain standards and promote the wider pet industry. Members abide by a Code of Ethics and agree not to bring the industry into disrepute.

The PIA takes this opportunity to make a submission supporting the Ornamental Fish and Marine Invertebrates (Ornamari.All) Import Health Standard (HIS) draft consultation document issued under the BioSecurity Act 1993.

The fish keeping industry in New Zealand, in all its various forms, is currently constrained and restricted by what it is able to offer to a growing market. There is demand and scope for the industry to be much larger and it is our belief that this HIS will contribute to addressing the situation.

There is currently only limited breeding of ornamental fish undertaken in New Zealand. Whilst there is a relatively large list of species available for import, the reality is that only a few species are imported and suppliers struggle to maintain a consistent supply of quality product.

The availability of live fish is a driving force for the sale of all the ancillary equipment and services required to keep aquariums and that segment of the industry is many times the size of the value of the fish trade alone. Fish quality, at present, tends to be poor and inconsistent which is a constraining factor for our members specialising in aquatics. Therefore, the prospect of gaining access to a more consistent supply of quality ornamental fish and marine invertebrates appeals to our members and the wider industry.

On the understanding that all suppliers seeking to import product to New Zealand will all meet stringent regulatory and compliance restrictions in order to be recognised and approved as registered

---

suppliers of ornamental fish and marine invertebrates, the PIA supports the introduction of pre-export isolation as an additional route to import fish as well as the current restricted post importation quarantine through the transitional facilities established in New Zealand.

Please acknowledge the PIA as part of your stakeholder group and keep us informed of any and all developments regarding the importation and supply of pets and products in New Zealand.

Yours faithfully

Brenda Chalmers  
RetailNZ Trade Group Administrator  
E: [Brenda.Chalmers@retail.kiwi](mailto:Brenda.Chalmers@retail.kiwi)

On behalf of the PIA Executive Committee:

Mike Tasker	Pet Essentials, Whangarei
Daniel Smith	MARS New Zealand, Auckland
Mark Woodrow	Kongs (NZ) Ltd, Tauranga
Mark Summers	Petware Ltd, Auckland
Peter Dunne	Healthy Petfoods, Auckland
Linda Ashworth	Pet Central Hornsby, Christchurch
Graeme Lewis	Petsmart NZ, Invercargill

The Pet Industry Association of NZ (PIA) is a specialist trade group within Retail NZ, a not for profit organisation, representing suppliers and distributors of products and services in the New Zealand pet industry.  
: [Brenda.Chalmers@retail.kiwi](mailto:Brenda.Chalmers@retail.kiwi) Mob: 027 265 1380 Post: P O Box 12086, Wellington, 6144, NZ

## 4.25 Natasha Walsh

From: Natasha walsh [mailto:tarshasalibi@hotmail.com]  
Sent: Thursday, 22 September 2016 3:50 p.m.  
To: Animal Imports <Animal.Imports@mpi.govt.nz>  
Subject: Risk management proposal for ornamental fish and marine invertebrates

Deal MPI,  
My name is Natasha Walsh of 446 Maisey Road, Matamata my phone number is 0273736474. I have a 400L tank at home and would like to show my support for the risk management proposal for importing fish into New Zealand. I would like to see change in the industry and think it a good idea you are looking at making changes.  
Thanks  
Tarsh Walsh

---

## 4.26 Mark Paterson, Federation of New Zealand Aquatic Societies

From: Mark Paterson [mailto:president@fnzas.org.nz]

Sent: Thursday, 22 September 2016 4:03 p.m.

To: Animal Imports <Animal.Imports@mpi.govt.nz>

Subject: Submission: Import Health Standard: Ornamental Fish and Marine Invertebrates

Submission: Import Health Standard: Ornamental Fish and Marine Invertebrates ORNAMARI.ALL

The Part1:1.13, PEI. Pre Off-Shore Isolation portion of the draft standard has provided opposite opinions from our member community on how this may impact the future of their hobby with three main views expressed.

1. The changes proposed may allow for cheaper, reliable, more diverse range of species and more efficient forms of importation of ornamental fishes. This should help further the amount of people keeping fish as a hobby.
2. It will allow for larger Pet Store chains to possibly create a monopoly based on their securing of off-shore quarantine facilities in Australia thus causing closure of many different businesses and their currently-running On-Shore facilities. It is felt this will ultimately lead to fewer harder to source species currently on the allowable import list being available to hobbyists.
3. Thirdly is concerns based around animal welfare, based on the increased length of time in shipping involved with using an offshore facility as this may cause undue extra stress on the fish therefore increasing the possibility of disease or death on the animals involved.

We understand that a change is necessary to bring New Zealand into line with other countries worldwide and will hopefully be an improvement on our current system while ensuring sustainable practises are followed in the industry from collection point to the end user. Owing to the difficulty of knowing which future outcome is likely we feel we can neither support nor oppose the proposed standard but feel there are some essentials that need to be taken into consideration on this matter.

- Ensuring quality auditing of approved of Off-Shore facilities, preventing potential issues such as hidden diseases or misidentification of fish.
- The health and wellbeing of the animals being imported according to our current Animal Welfare Act.
- Providing a level “playing field” in the future standard that will be fair and equitable on current importers and all other related businesses in terms of costs and the practicalities of Off-Shore quarantine, preventing a monopoly created by larger companies.

Part1:1.13.(1)e)ii). Weekly Visits for Off-Shore Quarantine Provided that enforcement of current rules remains effective, we are in full support of weekly visits from MPI for On-Shore Quarantine, as this means compliance will be standardised for local import facilities and allows for healthy competition with PEI importers.

To create a standardisation between On-Shore and Off Shore Quarantine the use of anthelmintic medications (such as Levamisole, Praziquantel or both) should be allowed by local import facilities as this allows fish to be treated for internal parasitic diseases helping ensure fish available to the hobbyist are parasite free at the same time as reducing risk of new parasites entering the country through the Aquatic trade. From feedback from our members it seems that currently certain species of fish (Apistogramma spp., Otocinclus spp., Symphysodon spp., Tetraodontidae family etc) come in to the country with internal parasitic infections which are frequently undiagnosed and can cause malnourishment and permanent damage to the fish's immune system leading to stress of the fish or death.

Conclusion

---

The executive of the Federation of Aquatic Societies thank the Ministry for the opportunity to submit on this draft proposal and greatly appreciate the work that is being done by MPI. towards ensuring a more secure importation regimen in line with recognised international standards.

Regards

Mark Paterson

President of the Federation of New Zealand Aquatic Societies.

On behalf of the Executive Board.

Contact:

president@fnzas.org.nz or secretary@fnzas.org.nz

Mobile:- 0273563840

## 4.27 Trent Lloyd

- From: Trent Lloyd [<mailto:farworld@icloud.com>]
  - Sent: Thursday, 22 September 2016 4:39 p.m.
  - To: Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>
  - Subject: MPI submission : draft import standard for ornamental fish and marine invertebrates
  - - In regards to the proposed changes to ornamental fish standards re importing and quarantine procedures I am for the proposed changes. As the manager of a new national hobbyist network focusing primarily on the care and trade of tropical fish in an online community I believe it's critical we make these, and still more steps to lift the hobby's profile in New Zealand. Many don't seem to realise the connection between this hobby and a range of environmental and educational opportunities. Besides the obvious oceanographic applications the more subtle, and yet more prolific aspect of freshwater environments, both their health, and maintenance, seems highly underrated.
    - I began this hobby at the age of ten, and paid for new fish with my paper run money. It kept me fascinated and out of trouble for many years, and I have always aspired to have at least one aquarium anywhere I lived. Over the years I learnt the nuances in living systems in a way no other source has imparted, and I now pass this knowledge on to a receptive and enthusiastic new generation. Sadly in past years the hobby has suffered for bad management by existing institutions within the hobby community, and an attitude of "can't be done" became prevalent. Much of this cynicism has been attributed to a purportedly stubborn and apathetic authority in terms of industry expectations and the ever increasing overheads of fish importation. My group represents a form of resurgence in interest I feel is driven by a growing community of environmentally conscious individuals looking to apply their beliefs in a practical and achievable form.
    - For me, the ultimate tragedy would be to see the already very limited range of flora and fauna continue to disappear, and many of the private outlets I have spoken to have already thrown up their hands in despair, and many who haven't already, are now preparing to close. It's a sad shadow of what it once was. Opening the industry up to new players offers the opportunity to bring in stock that currently is cost prohibitive, like aquatic plants especially. And opening up greater dialogue between the public and government is something I find to be an imperative if the industry as a whole is to have any cohesion or relevance. A post was made just yesterday that described a common aquarium plant that was banned in 1993', yet this was the first any of us had heard of it!
    - If it's at all possible to expand the range of flora and fauna available to the average hobbyist then we should encourage it as best we can in a responsible, and accountable manner. What I feel needs to happen though, is a clearer and more meaningful way for hobbyists to interact or enquire of MPI, as currently no such facility exists. This will only help with the control of unwanted organisms, and also help create a more informed and diligent fish keeping community. I also have found it very difficult to assign a given species to the names currently given on the allowable import list, as many
-

are no longer used or applicable in many cases. Which is where an interactive aspect of MPI would be very valuable in determining a species suitability to import before problems arise.

- I would also like to see an effort made to legitimise the import of ornamental freshwater invertebrates, as overseas these now account for over half of all hobbyists aquariums. And should we be able to import them, so the hobby could realise a greater portion of its potential in this country. Again, the growth of this hobby represents a boon to conservation and environmental awareness in New Zealand, rather than a threat. And the changes allowing for import direct from Australian quarantine facilities could be the saving grace the hobby desperately needs.

- 

- Sincerely
- Trent Lloyd
- Founder New Zealand Tropical Fish Hobbyist

- 

- [Trent@nztfh.co.nz](mailto:Trent@nztfh.co.nz)
- [Farworld@icloud.com](mailto:Farworld@icloud.com)

## 4.28 Warren Garrett, Brooklands

**From:** Warren Garrett [<mailto:Warren@brooklands.co.nz>]

**Sent:** Thursday, 22 September 2016 5:01 p.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Re: Stakeholder Notification of Draft - ORNAMARI.ALL

To Whom it may concern

Thank you for the opportunity to submit on the IHS for Ornamental Fish and Marine Invertebrates (ORNAMARI.ALL).

### 1.5 HS codes

We also use the following HS code for live coral if you can add to the list : **0508** Coral and similar materials, unworked or simply prepared but not otherwise worked; shells of molluscs, crustaceans or echinoderms and cuttlebone, unworked or simply prepared but not cut to shape; powder and waste thereof

(is 0308 an actual code or is this a typo and meant to be 0508?)

#### 1.10.1 Import permit

*(1) For ornamental fish and marine invertebrates described in 1.1.1(1)a)i) and 1.1.1(1)a)ii) the consignment must arrive in New Zealand with a valid import permit issued by MPI (copy acceptable). The importer must supply the following information to obtain a permit:*

*a) through to f)*

In reference to the Import Permit requirement to 1.1.1 (1)a)i) an annual multi-permit is accepted for NZ Transitional Facilities as outlined in 1.9. Unlike a single entry Import permit, when a multi Import permit is issued it is not a requirement nor is it possible to provide all of the information listed in 1.10.1(1) a-f. The wording needs to be changed here to correct this statement.

#### 1.11 Inspection and verification

*(1)iii) The outer containers holding the containers of ornamental fish and marine invertebrates must be sealed with tamper-evident seals, such as MPI-approved tape or seal, to ensure that biosecurity is maintained between the place of first arrival and the transitional facility.*

---

The taping of the boxes by MPI staff at Auckland Airport remains an issue of contention for all importers. We are constantly told that the delays with the taping are due to lack of resources and staff at the airport. Generally our driver has to assist with the taping of the boxes as MPI staff are not allowed to lift the boxes on their own for health & safety reasons. It is ridiculous that we are often delayed for the sake of wrapping a strip of packing tape around each carton and then we often end up doing the job ourselves. Whether this packing tape would actually prevent tampering is questionable. MPI need to seriously review this requirement and ask what the benefits of taping these boxes is and if it does actually mitigate the risk. Otherwise MPI need to put better systems into place at the airport to ensure a more satisfactory level of service.

### **1.11 Inspection and verification**

*(1) For ornamental fish and marine invertebrates described in 1.1.1 (1)a)ii):*

*On arrival, all documentation accompanying the consignment must be verified by an Inspector. The Inspector may also inspect the consignment, or a sample of the consignment on arrival.*

For pre-export isolation why is a physical inspection of a sample of the consignment or whole consignment not mandatory at the border? The reason for this is most likely that there is a lack of trained MPI staff at the airport to carry out such checks, rather than mitigating the risk. It will also be difficult to identify species at the border as the water in the will be hard to differentiate from another. This means that MPI Inspectors will have to be even more vigilant in these circumstances to ensure that unwanted/illegal species are not either unwittingly or intentionally slipped in with these consignments.

This following statement is extremely vague and leaves the option to conduct physical checks wide open to interpretation; *The Inspector may also inspect the consignment, or a sample of the consignment on arrival.*

We accept that documentation will accompany each consignment which has been endorsed by an offshore authority, but only frequent physical checks can ensure that non-permitted species are slipping across the border with these consignments. If we take Australia as an example the list of fish they are permitted to import is quite different to the NZ permitted list and they also have many native species that are not allowed in NZ. They will be holding fish and invertebrates at their facility that are not allowed in NZ and either unintentionally or intentionally unwanted species may be included at the time of packing. Physical inspection of the fish is the only way to ensure that the fish sent comply with both the shipping documents and the IHS requirements. We have to remember that these fish will be going directly to pet stores or to private individuals here in NZ. MPI should be making mandatory physical inspections on fish received after Pre-export Quarantine into NZ to ensure that no unwanted species slip across the border.

### ***Pre-Export Isolation***

We understand that there is a large Australian importer planning to ship freshwater tropical fish and goldfish across to NZ in a bid to supply local pet shops. As far as we are aware there have been no goldfish imports over recent years and all of the NZ goldfish that you see in the pet shops are locally bred. Global Goldfish in Te Aroha breed a large percentage of the goldfish for the local market and have done so for many years (also known as Braeside). We would question why MPI are proposing to open up our borders to the import of a high risk temperate species for which MPI identify as many as seven hazards requiring mitigation in the current IHS? The Australian importers are importing huge volumes of goldfish every week from China which could also be destined for our border if this pre-export is approved. NZ importers have to date kept away from importing goldfish due to the fact that local breeders are supplying the market needs, as well as the large number of hazards requiring mitigation as outlined in the current IHS. The only way to make goldfish imports viable from an economic view is to import volume and there is no doubt that this is what the Australian supplier will

---

be intending to do. Otherwise the costs associated with obtaining import permits, disease testing and other compliance costs would not be worthwhile.

Have MPI thought these issues through and do they have the resources to cope with 50 orders arriving into Auckland airport on the same day which would be destined for NZ retailers?

We can understand why offshore quarantine is a desirable option as in theory as it mitigates the risk of unwanted organisms or disease reaching our shores. We also have to consider the impact of this Pre-Export Isolation could potentially halve the business for NZ importers, most of who have a well established and stable history supplying the local market. If a large Australian exporter was to move into our market and in a few years time this didn't prove to be economically viable they would simply walk away leaving our industry in ruins.

For these reasons we think that the pre-export quarantine option needs to be considered very carefully.

Please let me know if there is anything further that we can assist with in this review.

Regards

Warren Garrett  
Director



21 McGiven Drive New Plymouth 4371 New Zealand.

Ph +64 6 7535346 | Mob +64 27 4753009



## 4.29 Josiah Pit, Aquarium Industries



22<sup>nd</sup> September 2016

Animal Imports

Ministry of Primary Industries

AnimalImports@mpi.govt.nz

### Submission on draft Import Health Standard Ornamental Fish and Marine Invertebrates (ORNAMARIALI)

Thank you for the opportunity of providing a submission on the current draft of the Import Health Standard (IHS) relating to Ornamental Fish and Marine Invertebrates (ORNAMARIALI).

#### INTRODUCTION

1. Aquarium Industries Pty Ltd ("Aquarium Industries") is an importer and distributor of aquarium fish to the Australian pet and aquarium industry. Established in 1968 and with over 50 full time staff, we supply more than 5 million fish to the Australian market via our 800 retail clients. With very long established supplier relationships and regular visits to their facilities, Aquarium Industries prides itself on delivering a superior quality product to the market. With a strong focus on education, we have developed an online training program, "Fish School" (<http://www.aquariumindustries.com.au/fish-school/>), which is designed to help new people to the hobby of fish keeping to gain the basics of fish care as well as an advanced module for those looking to educate themselves further. In addition we have a training program designed for retailers to understand the principles of fish care in a retail environment. These modules sit on a learning management system allowing us to assess retail staff members; to date over 3000 people have graduated these courses. Aquarium Industries also seeks to educate the fish keeper through educational collateral e.g. material to teach people about biosecurity risks and the proper way to keep fish, which if supplied alongside our imported fish could have benefits to New Zealand biosecurity and ornamental fish welfare.

With the largest purpose built Aquarium fish quarantine facility in the world, Aquarium Industries are in a good position to provide high quality fish to the New Zealand Pet and Aquarium industry. Our facility is audited annually by the Department of Agriculture and Water Resources and officers attend to our facility 4 days a week to release fish that have passed the detention period. We have recently also become the only Australian approved freshwater fish supplier to the SEA Life Entertainment Group that has Public Aquariums all over the world.

#### ADVANTAGES FOR NEW ZEALAND ARISING FROM THE INTRODUCTION OF PRE-EXPORT ISOLATION

2. Aquarium Industries welcomes the introduction of pre-export isolation (PEI) as an additional route to export fish to New Zealand;

3. We consider that pre-export isolation, carried out in well-resourced facilities under the supervision of the competent authority of the exporting country means that biosecurity risk is dealt with before the fish ever cross the New Zealand border. This must be regarded as a positive outcome for New Zealand and we understand that this is consistent with the MPI stated strategic objective of moving risk off shore;
4. Pre-export isolation as an adjunct to the current post-importation quarantine in Transitional Facilities, will provide the following advantages to New Zealand:
  - a. Established systems capable of handling large volumes of ornamental fish mean cost efficiencies in the process that can result in more competitive prices for fish, benefitting the fish keeping hobbyists in New Zealand;
  - b. More fish will become available through the retail chains and independent fish retailers, which will be of benefit to retailers, their employees and the hobby at large;
  - c. Due to established supply relationships and our buying power the fish directed to New Zealand will be of high quality. Our buying power is more likely to ensure higher quality fish perhaps than a small importer can achieve, given a smaller annual spend with individual suppliers;
  - d. Better quality fish represent a lower risk for New Zealand; they will tend to be healthier as they are at the upper end of the population distribution. Fish that have grown better, are less stressed and are in a good plane of nutrition are more likely to have better immune status and therefore be stronger for the consumer;
  - e. A wider range of fish than currently available. This in turn also energises the hobby; new people enter because of the range of fish available, and current fish keepers expand their collections to keep some of the new species. This results in not just retail income from increased fish sales but also from the equipment necessary to house and look after the extra fish;
5. We expect a growth in the retail market and the size of the fish keeping hobby as a direct result of pre-export isolation;

#### SPECIFIC SUBMISSIONS ON THE DRAFT DOCUMENT

6. Clause 1.3.(2).a), 1.7.(1), 1.7.(3), and 1.13(1)(h)(v) - Aquarium Industries notes that at the time of consultation the document referenced in this section, namely *MPI Approved Diagnostic Tests, vaccines, Treatments and Post arrival Testing Laboratories for Animal Import Health Standards (MPI-STD-TVTL)*, had not been updated. It is important that this is updated in a timely manner and treatments approved for Australian quarantine approved premises be included in this standard, with or without conditions as appropriate;
7. Clause 1.8.(1) refers to packaging being transparent. Aquarium Industries routinely uses packaging that is opaque on the sides to reduce stress to the fish, however on inversion of the packaging the fish are clearly visible. We suggest that this clause is amended to indicate that packaging should have an area of transparency sufficient to enable a visual inspection of the fish inside the package without having to open the packaging;

8. Clause 1.9 references import permits. Aquarium Industries recognises that import permits are required by MPI to facilitate the administrative management of various risk pathways. The guidance suggests that for fish entering New Zealand and being directed to a transitional facility (TF), that a single import permit is required to cover a full calendar year. As the transitional facility operator in New Zealand cannot expect to know the number and species of fish they might import over that time period the import permit must serve only to ensure that MPI has confidence that the transitional facility is suitable for the purposes of importing fish. Fish which have an uncertain health status with no previous clinical or testing history;
- a. The guidance then suggests for fish being imported from pre-export isolation (i.e. fish that have passed New Zealand import health standards, have a known health status that is acceptable to New Zealand and with a known clinical and testing history) requires a new import permit on each occasion. This seems at odds with the apparent purpose of an import permit for importation to a transitional facility. Aquarium Industries believes that the import permit requirement is not being applied equally nor, given the information that can realistically be supplied on an import permit application for either TF or PEI route, that repeated import permit applications are not warranted to manage risk;
  - b. Specific paperwork for both TF and PEI shipments will be presented to MPI at least 72 hours in advance of arrival. Whilst, on the one hand, imported fish held in a transitional facility may be detained pending investigation of any paperwork irregularities, they are physically of a higher risk than those from pre-export isolation, whereas those from pre-export isolation can be reshipped to their port of origin if necessary;
9. Clause 1.10.1 details the information requirements for an import permit under both TF {1.1.1(1)(a)} and PEI 1.1.1(1)(a)(ii) import routes. Clause 1.10.1(1)(b) requires a list of scientific genus and species, number and origin of the ornamental fish in each container. This information would generally not be available at the time of application for an import permit under the PEI route given the processing time for an import permit and the expected short lead time for import orders. However, this information would absolutely not be available for imports via the TF route for permits valid for one year. It is clear that this information, together with health history and testing certificates where necessary, would be supplied 72 hours in advance as per 1.10(3) for both PEI and TF routes, and that this represents a more significant risk management point in the import pathway than the application for or granting of an import permit;
- a. It is therefore suggested that, from a risk management perspective, the import permit mainly functions to ensure that either the TF or the PEI facilities are known to and are approved by MPI before any importation occurs. Thus it is suggested once again, that from a risk management perspective, the requirement for repeated import permit applications is an unnecessary burden on importer and MPI resources, when, once a PEI facility is approved it could be granted a yearly permission to import as per the TF route. This does not adversely impact risk as the risk management occurs either via pre-export quarantine and testing requirements plus 72 hour paperwork check, or 72 hour paperwork check plus post-import quarantine and testing requirements;
10. Guidance box at Clause 1.11 – the first dot point ends in an error; it refers to clause 1.10(5) which does not exist. It is suggested that this should be 1.10(3);
-

11. Clause 1.13(1)(d)(iii) should be amended or removed as the use of some treatments are permitted and therefore some basic health conditions may be seen and effectively treated with no risk to quarantine; in addition the risk management measures in Part 2 specify the clinical signs of concern, at which point testing may be carried out, and a batch may test clear of the risk organisms of concern in which case the remaining fish are still eligible for certification, providing they are clinically healthy at the time the health certificate is issued;
12. Clause 1.13(1)(d)(iv) specifies that "Other personnel may be granted access only where approval is given by the certifying official." Aquarium Industries queries whether this would be an official at MPI or the Competent Authority of the exporting country? In addition, is this clause applicable to maintenance contractors etc.?
13. Clause 1.13(1)(f)(i) requires that the premises are emptied and thoroughly cleaned and disinfected before the commencement of each PEI. In reality, PEI processes will be ongoing on a continuous and overlapping basis and it is not practical to require a whole facility to be emptied and stood down when the same risk management can be achieved by ensuring the application of Clause 1.13(1)(f)(ii);
14. Clause 1.13(1)(h)(ii) states that "*In the event of a positive test result for an exotic disease, all fish and marine invertebrates in the batch must be tested and shown to be free of the relevant disease organism/s, or euthanised (in which case testing is not mandatory)*". For clarity, since the PEI is not in New Zealand, we assume the intent is regarding diseases exotic to New Zealand, rather than exotic to the exporting country. It is suggested that this is clarified in the text and that the ability to treat for some of the identified risk organisms is also recognised. Such wording could read "*In the event of a positive test result for an identified risk organism specified in Part 2, all fish and marine invertebrates in the batch are (1) treated in the manner specified in Part 2: Specified Requirements for Identified Risk Organisms where such treatment is permitted OR (2) all fish and marine invertebrates in the batch must be tested and shown to be free of the relevant disease organism/s, OR (3) all fish and marine invertebrates in the batch must be euthanised (in which case testing is not mandatory)*";
15. Clause 1.13(1)(h)(v) refers once again to the *MPI Approved Diagnostic Tests, vaccines, Treatments and Post-arrival Testing Laboratories for Animal Import Health Standards (MPI-STD-TVTL)* document. This needs to be updated prior to the commencement of the operation of this new import health standard;
16. Clause 1.13(1)(h)(vii) details the requirements for the fish and marine invertebrates once PEI requirements have been met. Due to the length of the PEI process, fish and marine invertebrates will be put through the process in anticipation of the expected orders, so to ensure an adequate species range and number for retailer ordering (which generally will only be known the week of delivery given the way the industry functions). PEI operators will have to put large batches of fish continually through the New Zealand PEI requirements. Once the PEI requirements have been met the fish are deemed to be ready for New Zealand import, but not all fish leaving PEI will be immediately packed for export. The probability is that export shipments will be made up of a variety of tanks and part-tanks representing a portion of a cleared PEI hatch. Aquarium Industries is committed to ensuring that we represent no elevated risk to New Zealand; as such we identified that the holding environment once PEI requirements are met is as important as the PEI quarantine itself, and that packing of tanks or part tanks should not occur from within the PEI quarantine facility, but only once fish have moved out of the PEI quarantine facility, thus eliminating any risk of equipment cross contamination or error

in tank identification resulting in un-cleared fish being packed. We therefore suggest that this clause is re-worded to read *"Following PEI and prior to (and during) export, ornamental fish and marine invertebrates must be held in a biosecure area, with management procedures in place to ensure isolation and prevent contamination, separate from any area where ornamental fish or marine invertebrates are held that have not fully met PEI requirements."*

17. Part 3: Model Health Certificate, Section (6). This section requires certification that the fish were kept in an MPI approved facility. This suggests that facilities must apply to, and be approved by MPI before being eligible for PEI activities. Aquarium Industries queries whether the facility needs to be registered with the Competent Authority of the exporting country too; and suggests that this is required, but seeks clarification;
18. Part 3: Model Health Certificate, Section (8). This section should be re-written as "Ornamental fish and marine invertebrates were identified as clinically healthy at the end of the pre-export isolation period." to be consistent with Clause 1.13(1)(c)(iv) of the draft IHS;
19. Part 3: Model Health Certificate, Section (9). This section should be re-worded to be consistent with the suggested strengthened wording of Clause 1.13(1)(h)(vii), explained previously in this submission (point 17 above);
20. Whilst the health certificate does indicate that fish species not listed in Schedule 3 (i.e. high risk fish and marine invertebrates) are not required to undergo the specific risk management measures indicated in Part 2: Specified Requirements for Identified Risk Organisms, the import health standard itself is not clear in the division and difference of quarantine requirements for those species listed in Schedule 3 as compared to those listed in Schedule 4 but not Schedule 3. It is suggested that the import health standard be amended to reflect that any individuals of those species listed in Schedule 4, but not Schedule 3, are eligible for importation to New Zealand as long as they survive the stated quarantine periods and can be certified as being clinically healthy at the time of export. This is alluded to in Clause 1.13(1)(g)(i) but is not explicit.

We look forward to MPI finalising the Import Health Standard to permit the alternative route of entry of fish to New Zealand, through pre-export isolation. If you require any clarification regarding any of the points in this submission, please do not hesitate to contact me if you require clarification on any point.

Regards



Dr Josiah Pitt

Operations & Supply Chain Manager

Aquarium Industries



### 4.30 Peter Wilcox, Genesis Aquaculture

**From:** Peter Willcox [<mailto:p.willcox@icloud.com>]

**Sent:** Friday, 23 September 2016 12:42 a.m.

**To:** Animal Imports <[Animal.Imports@mpi.govt.nz](mailto:Animal.Imports@mpi.govt.nz)>

**Subject:** Ornamental Fish Import Health Standard (ORNAMARI.ALL) Submission

Peter Willcox (Managing Director)  
Genesis Aquaculture Ltd  
122 Perry Road,  
RD3  
Warkworth 0983  
email: [p.willcox@icloud.com](mailto:p.willcox@icloud.com)

I am writing to give my endorsement to the changes to the Ornamental Fish Import Health Standard (ORNAMARI.ALL). The changes I believe are a step in the right direction. I believe that should the changes be implemented correctly then the changes will enhance the ornamental fish industry within NZ through the increased opportunities the standard will allow.

While widely read on the topic of biosecurity matters as they relate to fish, I do not judge myself to be an expert. However, based on my review of the standard, I am of the view that the proposed new standard will meet the requirements of keeping disease out of NZ for all species except *Carassius Auratus* (Goldfish). *Carassius Auratus* does raise some specific concerns due to its high biosecurity requirements as detailed in the proposed standard. These concerns arise out of my being involved in the farming of goldfish, grass and silver carp within NZ and also a need to import goldfish. My concerns regarding the importation of *Carassius Auratus* lie in the following areas. I have raised these issues with MPI prior to writing this response but have had no response addressing the concerns and therefore I raise them now into the public spotlight.

The proposed IHS relies on other documents for the standards efficacy. Hence my use of the phrase, in the 1st paragraph of this response, *"should the changes be implemented correctly"*. The proposed standard is okay as currently written but should the documents referred to in the standard not be dealt with appropriately then NZ's biosecurity could be put at risk through the importation of *Carassius Auratus*. I am not opposed to *Carassius Auratus* being imported into NZ, I am of the view that the species must be imported. To not import *Carassius Auratus* in my view exposes NZ to illegal imports and uncontrolled exposure to the diseases of concern. Therefore, importation must be done in a way which maintains NZ's biosecurity especially for diseases which can proliferate in our temperate waters. My concerns arise in the following areas:

#### **OIE Standards**

The draft standard refers to OIE standards for testing where OIE have an applicable standard. In some cases, an OIE standard does not exist for some diseases specified in the import standard. While the tests outlined in the standard may be very accurate in disease detection, the application of the definition of a batch for batch testing as defined in ORNAMARI.ALL is inadequate. My reading of the OIE standards do not indicate a better definition. This leaves the ORNAMARI.ALL text as the current default definition of a batch. This is concerning unless a better definition of how a batch of fish for testing is constructed in documents yet to

---

be published which the standard refers to. The definition of a batch in ORNAMARI.ALL currently states that a batch is *“All ornamental fish or marine invertebrates sharing a direct water system and susceptibility to any pathogens from Part 2 of the MPI Import Health Standard: Ornamental Fish and Marine Invertebrates.”* What this definition does not state is how long the fish have shared the direct water system. Is it 5 minutes, 1 day or question mark. The definition works towards maintaining biosecurity if the fish have been together long enough to ensure adequate exposure to the disease(s) of concern but if it is unknown how long the fish have shared the same water then there is no guarantee that the batch test will conform to the statistical requirements. It also leaves the batch testing process open to manipulation by those who value a quick dollar more than NZ’s biosecurity. This is best demonstrated by the following scenario. An importer has 2 batches of fish comprised of 100 fish in each batch. One batch has a disease prevalence of 10% while the other has no disease. To adequately test according to the standard, these fish require 2 batch tests comprising 29 fish for each batch. This means to adequately test for disease requires 58 fish to be taken for testing. The chances are good that in this situation 1 batch will test positive for disease and the other negative resulting in one batch having to be destroyed. However, should the 2 batches be combined into 1 then only 31 fish need to be taken for sampling and the disease prevalence drops to 5%. An unscrupulous importer prepared to take a gamble may deliberately choose to combine the batches due to the cost savings that can be achieved combined with a lowered chance of having disease detected. The unscrupulous importer does take the gamble of losing both batches of fish should disease be detected but the statistics of the test have swung hugely in his favour should he choose to do so. However, the longer the fish from the 2 batches share the same water, the more likelihood that any diseases present will be shared and therefore detected in batch testing. Therefore somewhere in the import standard there needs to be a specification as to the minimum time fish must share the same water before sampling for batch testing occurs. Ideally this starts from the date of entry into quarantine or batch combining whichever ever comes latest. This time will need to take into account the disease characteristics related to the disease being tested for. Hopefully the length of time fish share the same water will be documented in the MPI-STD-TVTL document. Not having the revised MPI-STD-TVTL document available at the same time as reviewing the ORNAMARI.ALL means I must emphasise the weakness of the batch definition as currently stated in ORNAMARI.ALL. I have been asking from MPI for some time how a batch for testing is to be formed with no response other than the definition for a batch as given in ORNAMARI.ALL. It is my view that failure to address this issue and the importation of *carassius auratus* (goldfish) will put at risk of disease goldfish, grass and silver carp, trout, NZ native fish and salmon within NZ. The repercussions of this are likely to be significant.

### **Offshore Facility Operating Procedures Manual**

The facility operating procedures manual as applied by an offshore quarantine facility is not available for comment. As a result, NZ’s biosecurity is at the mercy of how MPI enforce clause 1.1.1 ii) *“Have met the requirements of this standard prior to import”* with no transparency to interested parties. An offshore quarantine facility’s operating procedures may be deemed commercially sensitive and therefore not publicly available for scrutiny to ensure that an ‘equal playing field’ is established between all quarantines importing fish into NZ. For the sake of current and future ornamental fish quarantine facilities supplying fish to NZ, we trust that the offshore quarantine providers operations manual will be made available upon request for the purposes of transparency and ensuring the requirements of the standard are met. An example of where trying to establish equivalence between a NZ and offshore based quarantine follows. A NZ based quarantine facility will have all fish in an import reviewed by MPI personnel to ensure there is a species match with the import documentation. This is inherent in the import process for NZ based quarantines. In the instance of an offshore

---



quarantine, equivalence in terms of meeting the standard could be questionable. In the case of an offshore quarantine, if a vet is not present at the time of witnessing the fish being packed and box sealing, then certification of the contents of a shipment will be in doubt. Between the time a vet certifies a shipment for export and packing, there is a window during which the shipment can be tampered with by adding or changing fish. Detection of tampering is solely reliant on random testing of shipments upon border entry. Potentially with time this will become problematic apart from the fact that all shipments will not be checked within NZ. With time, appropriately trained MPI staff will lose skills in identifying fish species and will not have the luxury of time to adequately assess the true identity of a species. The pressure will be on to get the shipment through the customs process as quickly as possible. Therefore to ensure that *'the requirements of the standard are met'*, the facility operating procedures manual for an offshore quarantine needs to specify that the certifying vet witnesses the fish being packed and sealed immediately prior to shipment.

### **Verified Separation from Carp**

Should the mitigation option of 'Verified Separation from Carp' be implemented, then NZ farmers of goldfish, grass and silver carp will be totally reliant on MPI to ensure that certification will be valid. It is my preference that this option be removed and that all fish be batch tested where applicable. 'Verified Separation from Carp' is potentially open to interpretation and subject to misuse.

### **General Issues surrounding an Australian Based Quarantine**

Finally, partnering with Australian Biosecurity at this time gives cause for concern based on feedback I have received from overseas ornamental fish suppliers. The change in Australian quarantine requirements for ornamental fish has caused multiple issues which it would seem Australian authorities choose to ignore or comprehend. The problems stem from the increased testing requirements for Australian ornamental fish imports and the pressure by Australia to get this testing done offshore. In this regard, Australia is unique. The result has been that most fish exporting countries outside of Asia have stopped exporting to Australia as it has just got too hard to deal with Australia biosecurity requirements. Ironically these are the countries with the least problems with disease and corruption is less prevalent. Australia is increasingly reliant on sourcing all of its ornamental fish from Asia where disease is more prevalent and corruption is more widespread and acceptable. Combine this with the push to get testing done offshore as Australia lacks capacity to do all the testing required and a potential 'perfect storm' is brewing for Australia ornamental fish imports. While partnering with an Australian based quarantine will have its benefits, I trust we will not be caught in its problems. NZ Biosecurity needs to be vigilant that NZ ornamental fish imports do not get caught up with the flow on effects brought on by Australia's biosecurity changes especially as an Australian based company is not answerable directly under NZ law. Should it make a mistake, it can not be held to account in a NZ court. It may lose its ability to import into NZ but NZ bears all the consequences.

Regards,  
Peter Willcox  
Managing Director  
Genesis Aquaculture

---



# **SUBMISSION**

BY THE

**Royal New Zealand Society for the  
Prevention of Cruelty to Animals Inc.**

ON THE

**Proposed Import Health Standard (IHS) for  
ornamental fish and marine invertebrates**

**and the**

**Proposed Transitional Facility Standard for  
ornamental fish and marine invertebrates**

Public Draft dated 22<sup>nd</sup> September 2016

---

## 2 Table of Contents

<b>3</b>	<b>Introduction .....</b>	<b>3</b>
<b>4</b>	<b>Feedback on the Proposed Standards.....</b>	<b>4</b>
4.1	Suggestions for Improvements to the Import Health Standard (IHS) for Ornamental Fish and Marine Invertebrates .....	5
4.1.1	The humane killing of ornamental fish and marine invertebrates.....	5
4.1.2	Tests and vaccines .....	6
4.2	Suggestions for Improvements to the Transitional Facility Standard for Ornamental Fish and Marine Invertebrates .....	6
4.2.1	Guidance on tank standards and groupings.....	6
4.2.2	Permitted environmental conditions.....	7
4.2.3	Record keeping.....	8
4.2.4	Training and knowledge .....	9
4.2.5	Veterinary and specialist support.....	10
4.2.6	Separate areas for specific tasks.....	10
4.3	Suggestions for Improvements which apply to both the Import Health Standard (IHS) for Ornamental Fish and Marine Invertebrates and the Transitional Facility Standard for Ornamental Fish and Marine Invertebrates .....	11
4.3.1	Transport standards .....	11
<b>5</b>	<b>Conclusions .....</b>	<b>12</b>
<b>6</b>	<b>References.....</b>	<b>12</b>

# **1 Introduction**

The following submission is made on behalf of The Royal New Zealand Society for the Prevention of Cruelty to Animals (The SPCA).

The SPCA is the preeminent animal welfare and advocacy organisation in New Zealand. We have been in existence for over 140 years with a supporter base representing many tens of thousands of New Zealanders across the nation.

The organisation includes 46 Animal Welfare Centres across New Zealand and the National Inspectorate whose inspectors enforce the Animal Welfare Act 1999.

## **7 Position Statement**

The SPCA believes there is sufficient evidence to show that fish and marine invertebrates are intelligent and sentient animals, capable of feeling pain and fear. Due to this, and because humans use and utilise so many hundreds of millions of these creatures through food production, the pet trade, and for other means, we feel strongly that it is important that they are protected and safeguarded through appropriate laws and enforced standards wherever possible.

The SPCA does not support intensive rearing systems of farmed fish and marine invertebrates with unacceptably high stocking densities. Free-range ocean-ranching of these animals is preferred to sea-cage-systems. If fish or marine invertebrates have to be reared in pens or cages, stocking densities should be low enough to enable them to perform natural behaviours and avoid health and water quality problems.

The SPCA is against slaughter methods for fish that are inhumane, such as suffocation, bleeding without stunning, allowing to die through asphyxiation and stunning using carbon dioxide gas. We fundamentally disagree with the processing of live fish, e.g. gutting, filleting or freezing. We are also opposed to the sale of live fish for food at markets and supermarkets. Fish should not be starved for longer than 72 hours before slaughter.

All crustaceans farmed for food, including shrimps, prawns, crayfish and crabs, should be slaughtered by methods scientifically shown to be humane. Crustaceans should never be gutted, filleted, frozen or subjected to any other form of processing whilst still alive. It is not humane to subject marine invertebrates to very high pressures or boil them alive.

The SPCA is opposed to any form of transportation of animals which causes pain, suffering and distress to any animal. We believe that the movement of fish and marine invertebrates should be kept as short as possible in both time and distance, and that it should be carried out using methods which ensure the best possible conditions for the animals in order to avoid distress and potential physical injury. No animal should not be transported unless they are fit to travel.

The SPCA does not recommend the ownership of exotic animals as pets because they usually require specialist knowledge and equipment, and it is especially difficult to meet their welfare needs. These animals can frequently be found to suffer from malnutrition, inadequate husbandry, inappropriate or insufficient companionship, poor environmental enrichment and unsuitable veterinary care when they are kept as pets by people who do not properly understand the animals' physiological and psychological requirements. We strongly recommend that anyone considering owning ornamental fish or marine invertebrates ensures they have sufficient knowledge of up-to-date information relating to their care and access to appropriate equipment and veterinary advice.

## **2 Feedback on the Proposed Standards**

The SPCA welcomes this revision of the standards for the importation and holding of ornamental fish and marine invertebrates – a trade that is not commonly discussed or considered within the public forum. The potential for damage resulting from the importation these animals is great (Walker & Winton, 2010), and therefore it is critical that the criteria in relation to this is improved in line with the findings of recent scientific research and kept abreast of stringent international regulations.

The question of whether or not fish can experience pain and welfare compromise associated with this is debated within the literature. The SPCA believes that there is ample evidence to show that fish are complex beings which are more than likely to be able feel pain.

Some researchers suggest that we should apply the precautionary principle, stating that we should not rule out the chance that fish and marine invertebrates can feel pain just because it cannot be proven definitively at this point in time that they are able to (e.g. Braithwaite & Ebbesson, 2014; Sneddon, 2015). The SPCA agrees with calls to apply the precautionary principle and therefore we suggest that information regarding the animals' welfare should be included in the IHS and Transitional Facility documents, not just in terms of pain and disease, but encompassing all aspects of their physical and psychological welfare.

The benefit to doing this is two-fold – catering for their welfare improves the animals' quality of life and is likely to also decrease their susceptibility to disease, as their immune system will not be compromised by the stress associated with poor welfare. The welfare of the animals, along with disease mitigation, should be a top priority from the moment the animals are imported or enter the holding facilities to their arrival at the intended destination. If the animals have to be killed, this must be carried out in a manner that promotes positive welfare so as to reduce the suffering that can occur as a result of the killing process (Huntingford et al., 2006).

The SPCA is largely in favour of the proposed changes to the Import Health Standard (IHS) and the Transitional Facility Standard documents. However, we strongly recommend that more detail should be included regarding the application of many of the standards. The lack of detail currently in these drafts opens statements up to individual interpretation and is likely to lead to inconsistencies in approach and a lack of desired results. For this reason, the SPCA puts forward the following recommendations:

## **2.1 Suggestions for Improvements to the Import Health Standard (IHS) for Ornamental Fish and Marine Invertebrates**

### **2.1.1 The humane killing of ornamental fish and marine invertebrates**

We propose that the MPI-approved methods for the destruction of ornamental fish and marine invertebrates, as referred to in the IHS draft document, should be included in the IHS document. The inclusion of additional information should include the following:

- Acceptable methods of humane destruction
- Who can conduct humane destruction (e.g. only trained staff competent in the task)
- What equipment is to be used in the process
- How this equipment is cleaned, maintained and stored, and why this is important (e.g. for proper functioning of the equipment)
- How often equipment cleaning and maintenance must occur (e.g. cleaning after each day it is used)
- How the animals will be handled and killed in order to ensure their welfare is not compromised
- Required records of humane destruction (e.g. how many animals are killed, from which tank, why, when, by whom, by what method, how they were disposed of and where)

#### 2.1.2 Tests and vaccines

The draft IHS states that “Diagnostic test(s) and vaccines used must be those that have been approved by MPI and documented in the MPI-STD-TVTL.” However, the MPI-STD-TVTL does not document any diagnostic tests or vaccines that can be used for ornamental fish or marine invertebrates. The SPCA strongly advise that this needs to be rectified so that there is clarity around which diagnostic tests and vaccines can be administered to the animals.

## **2.2 Suggestions for Improvements to the Transitional Facility Standard for Ornamental Fish and Marine Invertebrates**

#### 2.2.1 Guidance on tank standards and groupings

The SPCA strongly recommends that the Transitional Facility document includes specific guidance as to what standards the tanks used in facilities must meet. Different species of ornamental fish and marine invertebrates have varying needs in terms of the environment that they should be kept in, and a failure to meet these needs can lead to an increase in disease susceptibility (Walker & Winton, 2010) as well as poor welfare. Whilst it is not feasible to outline the specific requirements for each different

species, we feel that it is appropriate and necessary to add more general information in terms of tank specifications (e.g. what provisions and environmental enrichment each tank must contain, the shape of the tanks, the materials the tanks are to be made of, etc.).

The document should also clearly state that each species should be kept with roughly as many conspecifics as they would live with under natural conditions in the wild, and, therefore, consignments should be kept limited to batches of ornamental fish and marine invertebrates with numbers aligned to natural group sizes wherever possible. Inappropriate social groupings can increase stress levels and, subsequently, the direct and indirect (e.g. via injury caused by aggressive encounters) incidence of disease (Huntingford et al., 2006).

#### 2.2.2 Permitted environmental conditions

We feel that the Transitional Facility document lacks detail in regard to other environmental conditions that the animals can be kept in. For instance, there is no information in relation to how frequently inspections should be carried out and what each inspection should consist of, details of acceptable water quality levels, how water quality should be tested and when/how often, information regarding water and ambient temperatures, ventilation, lighting, feed type and frequency, noise levels and exposure to direct sunlight, as well as the actions that should be taken if issues are identified with any of these environmental factors. Substandard environmental conditions can increase the likelihood that the animals will become diseased (Francis-Floyd & Klinger, 2008; Huntingford et al., 2006; Li, Fu, & Duan, 2002; Morley, 2010) and directly impact their welfare.

Therefore, the SPCA would like to see information that regulates the environmental conditions of facilities housing ornamental fish and marine invertebrates added to the standards contained within the Transitional Facility document. As an example, it should be stated that all of the following aspects must be assessed for every animal in each tank during visual inspections:

- Body colour – has this changed?
- Body condition
- Gill condition
- Ventilation rates – are they normal, abnormally fast or abnormally slow?



- Swimming behaviour
- Other behaviour – e.g. hiding or grouping? If so, is this normal for the species?
- Injury or damage, growths, lumps or lesions
- Feed consumption – has food been left or has it all been consumed?
- Slow growth – if the animals are still growing and if it can be observed during the time period that they are housed at the facility (Huntingford et al., 2006; Li et al., 2002)

### 2.2.3 Record keeping

The SPCA proposes that there should be an increased focus on the importance of record keeping and details added to the Transitional Facility document to outline what responsible record keeping involves. For instance, details should be recorded of each inspection of the animals at the facility. These records should include information regarding the environmental aspects of the tanks and observations and treatment of the animals. General details should also be recorded such as the name of the person who carried out the inspection, when it was conducted, and any action that was taken as a result of the observations. If a disease outbreak or rise in mortality levels occurs, this information must also be recorded; these details, alongside other observations, can be invaluable in helping to determine the cause of the problem and prevent it from reoccurring.

The Transitional Facility document states that “If commercial waste facilities are used, records must be kept”. This statement provides insufficient detail as to what information needs to be recorded. In relation to waste facilities, we believe that the facilities’ records must include (as a minimum) the date of disposal, the location of disposal, what was disposed of and how, who disposed of the waste and, if disposing of dead animals, which consignment/tank these animals came from.

In addition, we propose that the visitor logbook required for biosecurity purposes should include a section for the visitor to state the connection(s) that they may have to other aquatic organisms or facilities housing aquatic organisms. This information can be used to establish each visitor’s level of clearance in the facility (e.g. whether or not they are allowed to enter the areas housing the animals) based on their likelihood of transmitting disease to or from other animals.

#### 2.2.4 Training and knowledge

It is essential that those caring for the ornamental fish and marine invertebrates are properly trained and sufficiently knowledgeable about their welfare and environmental needs. This will, in turn, ensure their risk of developing disease is reduced. Knowledge of the animals' environmental needs and preferences should include aspects such as feed type and amount, environmental enrichment and social dynamics. Understanding the animals' behaviour should encompass aspects such as normal vs. abnormal social, swimming, feeding behaviours.

Facilities must ensure that staff possess such knowledge in order to improve the animals' welfare, meet their needs, reduce their levels of stress associated with the entire importation process, and thus subsequently limit the extent of immunosuppression and overall reduce their susceptibility to disease (Balaji, Thirumaran, Arumugam, Kumaraguruvasagam, & Anantharaman, 2009).

In light of this, the SPCA believes that the Transitional Facility standards must place more emphasis on the importance of staff training and what this should entail within the document. It should be explicitly stated that staff must have successfully completed an MPI-approved training programme. In addition, annual update and refresher courses must be undertaken following the initial training programme, as well as each time there is a change to the facility environment or how the animals should be provided/cared for (e.g. structural change to an existing building, construction of a new building, installation of new equipment). The standards should clearly detail what aspects staff should be trained in, for example:

- Recognising the clinical signs of common fish and marine invertebrate diseases
- Understanding how to conduct their duties in a way that caters for the animals' behavioural and physiological needs and that minimises the risk of disease transmission between animals
- How to handle and move the animals in such a way that injury or unnecessary distress is not caused

The draft Transitional Facility document currently states that "Should the operator display a lack of sufficient knowledge leading to failure of an inspection, the MPI Inspector may require the operator to re-take the relevant training course or recommend suspension or cancellation of the operator approval." The SPCA believes that this is an insufficient requirement to ensure acceptable operating

practices. We propose that the document should instead make it clear that there should never be an occasion when operators display insufficient knowledge, as the facility management should ensure that all staff have the theoretical and practical knowledge required to pass an inspection with ease. If an issue with actions of an operator is discovered, the relevant person must automatically be required to re-take and pass the appropriate training courses in order to continue to work there. If deliberate cruelty to ornamental fish or marine invertebrates is discovered, the operator concerned must automatically have their contract terminated and the facility and its staff must be placed under additional scrutiny until the MPI Inspector is satisfied that all operators act properly and that there is no culture of cruelty.

#### 2.2.5 Veterinary and specialist support

Each transitional facility should be required under the standards to have a good working relationship with a veterinarian or qualified expert who specialises in the care of ornamental fish and marine invertebrates, and who can be contacted for advice or to visit the facility when needed. Ideally, the veterinarian or expert would be approved by MPI to ensure that the care of the animals is overseen by a trusted, experienced and knowledgeable person.

#### 2.2.6 Separate areas for specific tasks

The SPCA feels that the Transitional Facility standards should specify that separate areas are required within the facility for different purposes. For example, such designated areas should include separate spaces for humane destruction, the cleaning of equipment, packing/loading and feed storage. There should also be areas to separate animals where their fundamental needs differ (e.g. cold-water, tropical, marine, freshwater and those requiring isolation) so that they can be housed separately in an environment that meets their needs.

## **2.3 Suggestions for Improvements which apply to both the Import Health Standard (IHS) for Ornamental Fish and Marine Invertebrates and the Transitional Facility Standard for Ornamental Fish and Marine Invertebrates**

### **2.3.1 Transport standards**

We would like to see detailed transport standards for the movement of ornamental fish and marine invertebrates included within both the IHS and the Transitional Facility document. If care is not taken during transportation, there is a significant risk of disease transmission between the animals (e.g. if the animals are not carefully transported from the point of importation to the transitional facility, non-diseased fish may come into contact with disease causing agents from diseased fish, for example via splashing of tank water, and potentially become diseased themselves).

Research also suggests that the transport process, especially the loading and unloading stages, can have a profound effect upon the stress levels of the animals. Whether acute or chronic, this stress can negatively impact upon the immune functioning of the animals, overall increasing their likelihood of contracting disease (Huntingford et al., 2006). The Animal Welfare (Transport within New Zealand) Code of Welfare does not include specific information on the transport of ornamental fish or marine invertebrates, especially where disease transmission is of a concern. There is a small amount of transportation information in the draft Transitional Facility standard but not enough. Information that should be given in both documents includes:

- The maximum length of time that the animals can be transported
- How they are loaded/unloaded into the transport vehicle
- The type of vehicle that is acceptable for transportation
- How they are kept whilst in the transport vehicle (e.g. that the tanks are tied down, can they be stacked, etc)
- When, where and how the animals are inspected during transit
- What vehicle temperature is acceptable
- How the animals are protected whilst being transported (e.g. how are they protected from direct sunlight?)

### 3 Conclusions

Overall, the SPCA is supportive of the proposed amendments made by the 2016 draft Ornamental Fish and Marine Invertebrate Import Health and Transitional Facility Standards. However, we believe that significant improvements can be made to both documents to further ensure the welfare and health of the animals concerned. Our suggestions, outlined above, predominantly relate to the level of detail provided in both sets of standards, which we believe should be increased. We are grateful for the potential improvements to animal welfare that the introduction of these documents provides, and hope that our contribution can be used to enhance both resources to ensure the best outcome for the animals and the biosecurity status of New Zealand.

### 4 References

- Balaji, K., Thirumaran, G., Arumugam, R., Kumaraguruvasagam, K. P., & Anantharaman, P. (2009). A review on marine ornamental invertebrates. *World Applied Sciences Journal*, 7(8), 1054-1059.
- Braithwaite, V. A., & Ebbesson, L. O. E. (2014). Pain and stress responses in farmed fish. *Revue scientifique et technique*, 33, 245-253.
- Francis-Floyd, R., & Klinger, R. (2008). Disease diagnosis in ornamental marine fish: A retrospective analysis of 129 cases. In J. C. Cato, & C. L. Brown (Eds.), *Marine ornamental species: collection, culture and conservation* (pp. 93-101). Iowa, United States of America: John Wiley & Sons.
- Huntingford, F. A., Adams, C., Braithwaite, V. A., Kadri, S., Pottinger, T. G., Sandøe, P., & Turnbull, J. F. (2006). Current issues in fish welfare. *Journal of Fish Biology*, 68(2), 332-372.
- Li, D., Fu, Z., & Duan, Y. (2002). Fish-Expert: a web-based expert system for fish disease diagnosis. *Expert systems with Applications*, 23(3), 311-320.

Morley, N. J. (2010). Interactive effects of infectious diseases and pollution in aquatic molluscs. *Aquatic Toxicology*, 96(1), 27-36.

Sneddon, L. U. (2015). Pain in aquatic animals. *Journal of Experimental Biology*, 218(7), 967-976.

Walker, P. J., & Winton, J. R. (2010). Emerging viral diseases of fish and shrimp. *Veterinary research*, 41(6), 51-54.

#### 4.32 Greg, Fish 2 Water NZ

**From:** "Fish2WaterNZ ." <[info@fish2water.co.nz](mailto:info@fish2water.co.nz)>

**Date:** 25 September 2016 at 8:34:12 PM NZDT

**To:** <[Vicki.Melville@mpi.govt.nz](mailto:Vicki.Melville@mpi.govt.nz)>

**Subject:** Submission IHS for importation of ornamental fish and invertebrates

Hi Vicki,

I'm sorry this is a few days late. I hope it can still be considered.

Firstly, I am supportive of MPI's desire to help the ornamental fish industry grow and to get new genetics and fish into New Zealand. The next step is to review the allowed fish list and allow fish from the same family, area and conditions to be imported. Distinguishing down to the species and sub species level, in my view, unnecessarily restricts access to good specimens which pose no additional risk to New Zealand biodiversity.

My main concern regarding the proposed changes is how the transitional facilities out of New Zealand will be monitored to ensure they meet the standards. It gives me some comfort that Australia is the only country to be aloud to quarantine in country, however, a robust QA framework should be in place. I believe they have notifiable diseases there we don't have here which would allow the export of fish to Europe via NZ. This in itself isn't an issue, however, it would be a loss for these diseases to make their way here should the Australian quarantine not stack up.

My other concern, which I am aware you can't control, is the impact of this set up on transitional facilities here in NZ. Pet shops with Australian ties will no doubt take advantage of this new set up, as they should, bringing in large quantities of the "bread and butter" species, making smaller importers un-competitive and therefore reducing the overall ability of the industry to bring in specialty species. I certainly hope this is not the case but I guess time will tell. A mitigation to this risk is the above suggestion around extending the allowed species list (to species which pose the same risk level as currently allowed) would allow specialty transitional facilities to retain a competitive advantage

Once again, overall I am supportive of what MPI is trying to achieve.

Happy to discuss,

Greg

## 4.33 Canadian Food Inspection Agency



1400 Metivale Road  
Ottawa, ON  
Canada, K1A 0Y9

September 22, 2016

Mrs. Sally Jennings,  
Coordinator, SPS New Zealand  
PO Box 2526, Wellington,  
New Zealand  
Tel: (64 4) 894 0431 / Fax: (64 4) 894 0733  
E-mail: [sps@mpi.govt.nz](mailto:sps@mpi.govt.nz)

**SUBJECT: CANADA'S COMMENTS ON WORLD TRADE ORGANIZATION  
(WTO) NOTIFICATION G/SPS/N/NZL/538**

Dear Mrs. Jennings:

Canada would like to thank New Zealand for this opportunity to provide comments on the above notification, dated 27 July, 2016, concerning the "*Import Health Standard (IHS) Ornamental Fish and Marine Invertebrates*" and its impacts on the export of aquatic animals from Canada to New Zealand.

With regard to aquatic animal health matters, Canada respects New Zealand's right to implement appropriate sanitary measures to prevent the introduction, establishment or spread of aquatic animal diseases. Upon a review of the draft circular, Canada has identified a few items where clarification is required, as set out below.

Canada notes that the proposed IHS for ornamental fish and marine invertebrates contains import standards higher than current World Organisation for Animal Health (OIE) standards (per the *Aquatic Animal Health Code*) with respect to requirements for both disease freedom and pre-export isolation.

With regard to certification for disease freedom in species considered susceptible to diseases of concern by New Zealand (as listed in Schedule 3 of the IHS document), Canada notes that New Zealand's import requirements do not specifically include the option for certification of disease freedom based on country, zone or compartment freedom in the exporting country. Canada requests that New Zealand confirm that country, zone or compartment freedom is an equivalent measure (subject to negotiation) to mandatory testing on any future health certificate for ornamental aquatic animals negotiated (per 1.10.4 Equivalence) between Canada and New Zealand.

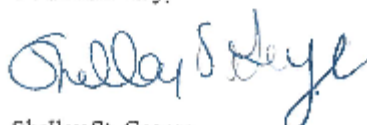
Moreover, New Zealand's requirements also includes mandatory pre-export isolation (per Part 1.13) with weekly inspections of the animals by a certifying official for diseases in all approved species of aquatic animals (Schedule 4) regardless of their susceptibility to diseases of concern to New Zealand (as listed under Part 2). The OIE *Aquatic Animal*



*Health Code, Article 5.1.2, point 1 recommends that "The import requirements included in the international aquatic animal health certificate should assure that commodities introduced into the importing country comply with OIE standards. Importing countries should align their requirements with the recommendations in the relevant standards of the OIE. If there are no such recommendations or if the country chooses a level of protection requiring measures more stringent than the standards of the OIE, these should be based on an import risk analysis conducted in accordance with Chapter 2.1."* Canada requests that New Zealand provide rational and justification as to why pre-export isolation for a minimum of three weeks is required for species not considered susceptible to diseases of concern (as listed under Part 2), and provide a copy of the risk assessment that New Zealand conducted that supports applying measures more restrictive than stipulated by the international standards.

Canada is grateful for the opportunity to provide these comments on the proposed requirements and looks forward to working with New Zealand to facilitate mutually-beneficial trade in aquatic resources. We would be grateful if you could follow up with Dr. Joanne Constantine, National Manager, Import/Export Aquatics Section ([Joanne.Constantine@inspection.gc.ca](mailto:Joanne.Constantine@inspection.gc.ca)) on your response.

Yours sincerely,



Shelley St. George  
Director  
Trade Policy Division

c.c.: Joanne Constantine, National Manager, Aquatics Section, Animal Import/Export  
Division, CFIA  
[CFIA-WTO\\_ACIA-OMC@inspection.gc.ca](mailto:CFIA-WTO_ACIA-OMC@inspection.gc.ca)

## 4.34 Agri – Food and Veterinary Authority of Singapore



### Agri - Food & Veterinary Authority of Singapore

52 Jurong Gateway Road #14-01 Singapore 608550  
Tel: 6805 2992, Fax: 6334 1831

Our Ref: IERD/OFS/L16/222

26 Sep 2016

Mrs Sally Jennings  
Coordinator, SPS New Zealand  
PO Box 2526, Wellington  
New Zealand

Dear Mrs Jennings,

#### **EXPORT OF ORNAMENTAL FISH AND MARINE INVERTEBRATES FROM SINGAPORE TO NEW ZEALAND**

We refer to the WTO Notification by New Zealand's Ministry for Primary Industries (MPI) with regard to the draft requirements for importing ornamental fish and marine invertebrates into New Zealand (G/SPS/N/NZL/538).

2 With regard to the proposed import health standards, we would like to make the following clarifications:

- a. All ornamental freshwater fish listed in Schedule 4 must be held in the pre-export isolation (PEI) facility for a minimum of four weeks, while marine fish and marine invertebrates would have to be held for a period of not less than three weeks before they can be exported to New Zealand. This would be to meet the requirements stated in Points 1.12(1)(b) and 1.13(g)(i). As the length of quarantine would have a direct impact on trade, we would like to seek MPI's clarification on the rationale for the quarantine duration for these aquatic species, as well as if the quarantine duration can be considered for reduction wherever possible.
- b. Point 1.13(e)(ii) requires the certifying official of the export health certificate to visit the export facility at least weekly during the isolation period. Given the high volume of export health certificates that we issue and the small team of officers doing so, we wish to highlight that it would be difficult for us to meet this criteria. However, our consignments and facilities are frequently inspected by official inspectors who then inform our certifying officers of the status of the inspected consignments. As such, we propose that consideration may be taken with regard to inspectors and certifying officials of the Competent Authority working together to ensure that the exported consignments are healthy prior to export.
- c. With regard to point 1.13 (h)(iii), all fish and marine invertebrates in the batch must be tested in the event of a positive test result for an exotic disease and shown to be free of the relevant disease organism or euthanized. We would like to request for consideration of this point to be amended to "All fish and marine invertebrates in the

batch cannot be exported to New Zealand in the event of a positive test result for an exotic disease”.

- d. With reference to Part 2 of the document on Specified Requirements for Identified Risk Organisms, we note that our laboratories currently do not carry out testings for some of the non OIE-listed diseases. These include aquabirnaviruses, viral haemorrhagic septicaemia virus (VHSV), *Edwardsiella ictaluri*, *Edwardsiella tarda* and *Lactococcus garviae*, some of which require these fishes to be tested negative before export. As such, we would like to clarify if New Zealand would be able to accept exports based on other alternative measures based on discussions between the Competent Authority of the exporting country and the Chief Technical Officer (CTO) of MPI. If such measures, including tests obtained of other approved laboratories, could be acceptable to MPI, we would proposed for point (3) under the “Diagnostic testing, vaccination, and treatment” section of the Model health certificate in Part 3 to be amended to reflect this provision.
- e. With regard to point 2.15 on White spot syndrome virus in Part 2, we would like to clarify that the target species showing clinical signs of white spot syndrome or sudden unexplained mortality would be crustaceans instead of fish.
- f. Tests listed in Part 2 are required to be in accordance to MPI-approved methods. Based on the link provided however in various points, eg. in Point 1.3(2)(a), 2.11(1) and 2.13(1) (MPI-STD-TVTL), we note that while MPI approved tests for *Bothriocephalus acheilognathi* and *Capillaria philippinensis* are included, the MPI approved tests of other diseases of concern listed in Part 2 of the document were not found. As such, we seek your assistance to provide the list of approved test methods for these diseases of concern.

3 We also understand that from Section 1.6 that with the implementation of these new requirements, approved species of ornamental fish and marine invertebrates listed in Schedule 4 may only be imported from a country where the Competent Authority has provided sufficient evidence to the satisfaction of the CTO in order for MPI and the Competent Authority of the exporting country to commence negotiation of country-specific health certification. While we understand that the requirements are intended to be implemented on 17 October 2016, we would like to seek your kind understanding to delay the implementation of these requirements until clarifications with trading partners have been completed. We would also like to clarify if there would be any interim measures during the negotiation period to ensure that disruption of trade of ornamental fish and marine invertebrates during this period would be kept to a minimum.

4 We hope our comments would be favourably considered, and we look forward to your response regarding this matter. Please contact me should you have further queries.

Thank you.

Yours Sincerely,



Lester Lee  
Senior Executive Manager  
Ornamental Fish Section  
Import & Export Regulation Department  
Quarantine and Inspection Group  
For Director-General  
Agri-Food and Veterinary Services  
Tel: +(65) 6751 9802  
Fax: +(65) 6759 5042  
Email: lester\_lee@ava.gov.sg

