



Risk Management Proposal

Risk Management Proposal Pangasid Catfish Products for Human Consumption from Thailand

FISFILIC.SPE

1 June 2018

Disclaimer

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Draft for Consultation

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1 Purpose

The purpose of this document is to:

- Show how options for the management of risk organisms in pangasid catfish products from Thailand have been assessed.
- Provide recommendations for import requirements.

2 Background

Under the [Import Health Standard for Processed Tilapia and Catfish for Human Consumption](#) (FISFILIC.SPE), pangasid catfish products for human consumption can be imported only from Vietnam and Malaysia. Thailand requested MPI to include it as one of the specified countries. This document presents the outcome of the review of Thailand's aquaculture and processing system and its capability to meet the requirements of the IHS.

3 Objective

The objective is to effectively manage biosecurity risks associated with the import of pangasid catfish products from Thailand consistent with New Zealand's domestic legislation and international obligations.

4 Options assessment

Under Article 3.3 of the World Organisation for Animal Health (OIE) Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement), risk management measures which provide a level of protection greater than provided by international standards may be imposed only when they can be scientifically justified on the basis of a risk assessment.

For a detailed analysis of potential hazards and their risks please refer to the following documents, which contain the relevant risk assessment and an analysis of management options for each risk organism.

- [Import Risk Analysis: Frozen, Skinless and Boneless Fillet Meat of Pangasius spp. Fish from Vietnam for Human Consumption](#), dated September 2008 (IRA 2008).
- [Supplementary Risk Analysis: Extension of Countries Eligible to Export Frozen, Skinless, Boneless Fillet Meat of Pangasius spp. under the Import Health Standard FISFILIC.SPE](#), dated April 2010 (IRA 2010).
- *Import Risk Analysis: Eviscerated Fish for Human Consumption*; due for publication late 2018.

5 General import requirements for pangasid catfish products from Thailand

5.1 Commodity definition

For the purposes of the *Import Health Standard for Processed Tilapia and Catfish for Human Consumption* (FISFILIC.SPE), the commodity eligible for import to New Zealand from Thailand is:

- (1) Skinless, boneless, frozen fillets (or mince derived from fillets);
- (2) Derived from *Pangasius* spp. that have been farmed and were continually resident in Thailand;
- (3) Not derived from CITES listed species;

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- (4) Not derived from fish that were slaughtered as an official disease control measure as a result of an outbreak of disease;
 - (5) Derived from fish that at the time of harvesting for processing did not show any clinical signs of disease, septicaemia or skin ulceration;

5.2 Facility, processing, and transport requirements

- (1) The fish are sourced from aquaculture farms registered with the Competent Authority of Thailand.
- (2) The fish are processed in establishments approved by the Competent Authority of Thailand;
- (3) Commodity is derived from fish processed using water fit for human consumption;
- (4) Commodity is frozen to -18°Celsius for at least 168 hours.

6 Recommendations for identified risk organisms

- (1) IRA 2008, IRA 2010 and the *Import Risk Analysis: Eviscerated Fish for Human Consumption* identified the following organisms of potential concern associated with Pangasiidae, or to which Pangasiidae are known or believed to be susceptible:
 - *Acinetobacter* spp.
 - *Aphanomyces invadans*
 - Atypical *Aeromonas* spp.,
 - *Chromobacterium violaceum*
 - Digenean metacercaria,
 - *Edwardsiella ictaluri*
 - *Edwardsiella tarda*
 - *Enterobacter* spp.
 - *Flavobacterium* spp.
 - Grass carp haemorrhagic virus
 - Iridoviruses
 - *Kabatana arthuri*
 - Larval nematodes
 - *Myxobolus omari*
 - *Serratia marcescens*
 - *Stenotrophomonas maltophilia*
 - *Yersinia ruckeri*
- (2) All of the above listed IRAs concluded that the organisms of potential concern in the commodity, as defined in Section 5.1 of this document, will have negligible likelihood of entry into New Zealand.
- (3) MPI viewed documents the Competent Authority of Thailand had previously submitted, and is satisfied that the procedures that are in place in that country would meet MPI's facility approval and processing requirements for the commodity. The documents that MPI specifically looked at are:
 - a) *Fish Inspection and Control Systems*.
 - b) *Processing Establishment Inspection Manual*.
 - c) *Condition Laying Down for Approved Processors*.
- (4) MPI additionally took into consideration that the fish for processing would be sourced only from aquaculture farms registered to the Competent Authority of Thailand. Registered farms are subject to monitoring for regulatory compliance.
- (5) Under the *Import Health Standard for Processed Tilapia and Catfish for Human Consumption* (FISFILIC.SPE), which has been in place since 2011, Thailand can import into New Zealand fish products derived from *Oreochromis* spp. The conditions of import that are in place for *Oreochromis* spp. are the

same as being proposed for *Pangasius* spp. This gives MPI the confidence that Thailand would be able to comply with the biosecurity import requirements for pangasid catfish products.

- (6) In conclusion, all biosecurity risks associated with pangasid catfish products from Thailand are mitigated to a negligible level as long as the requirements in *Import Health Standard for Processed Tilapia and Catfish for Human Consumption* (FISFILIC.SPE) are complied with.

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