

**Import Risk Analysis:
Freshwater Frozen, skinless
and boneless fillet meat of
Pangasius spp. from Vietnam
for human consumption**

REVIEW OF SUBMISSIONS

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Policy and Risk
MAF Biosecurity New Zealand



Import Risk Analysis: Freshwater Frozen, skinless and boneless fillet meat of *Pangasius* spp.
from Vietnam for human consumption.

Review of Submissions

September 2008

Approved for general release

A handwritten signature in black ink that reads 'Christine Reed'.

Christine Reed
Manager, Risk Analysis
MAF Biosecurity New Zealand

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Executive Summary

Biosecurity New Zealand carried out an analysis of the risks associated with the importation of frozen skinless and boneless fillet meat of *Pangasius* species (basa catfish) from Vietnam. The risk analysis was released for 6 weeks of public consultation, and submissions closed on 30 April 2008.

Two submissions were received on or before 30 April 2008, and one late submission received on 6 May 2008, was accepted.

Issues arising in submissions were:

- concern that there should be adequate protection from disease risk;
- proposals for periodic sampling of fish and/or product;
- concern over the possibility of diseases being ignored;
- the requirement to distinguish between potential and actual hazards;
- the requirement for consistency across exporting countries and commodities; and
- information on the quality standards for potable water in Vietnamese processing plants.

As a result of the submission from the Competent Authority of Vietnam the paragraphs in the executive summary and conclusion, worded as follows:

“None of the eight primary potential hazards were identified as requiring specific risk management measures; the process of filleting and the period of time frozen effectively reducing any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”

will be amended to:

*“**Following individual risk assessments, none of the eight primary potential hazards were identified as actual hazards in this commodity from Vietnam, thus eliminating any requirement for specific risk management measures. The process of filleting and the period of time frozen effectively reduce any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.**”*

to clarify that none of the potential hazards was considered to be an actual hazard in the defined commodity from Vietnam.

The final recommended risk management measures are:

“General sanitary measures are considered necessary:

- to ensure that the likelihood of clinically or subclinically diseased fish being harvested for processing is minimised:
 - both the farm of origin and the processing facility must be registered with the Competent Authority of the country in question; and
 - fish processed must be derived from broodstock resident in the exporting country; and
 - fish showing clinical signs of disease, septicaemia or skin ulceration must not be harvested for processing into this commodity; and
 - fish harvested must not be subject to emergency slaughter for disease reasons, regardless of whether or not they display clinical signs themselves.
- to avoid contamination of the commodity with exotic foodborne pathogens:
 - only potable water should be used during the processing of the fish into fillet meat.

- to ensure compliance with the freezing and transport time regime included in the commodity definition:
 - to ensure that the inactivation of organisms that is inherent in this freezing process does occur it must be determined that the commodity was frozen and held at -18°C , or lower, for at least 7 days (168 hours) before a biosecurity clearance is issued.”

1. Introduction

The completed risk analysis was approved for release for public consultation on 7 March 2008. The draft was subsequently subjected to at least 6 weeks public consultation. Submissions closed on 30 April 2008.

MAF Biosecurity New Zealand received the following submissions:

Name	Organisation Represented	Date Received
Robert Sowman	Fish & Game New Zealand	15 April 2008
Nguyen Nhu Tiep	Ministry of Agriculture and Rural Development of Vietnam	30 April 2008
Ron Dougherty	New Zealand Salmon Anglers Association Incorporated	6 May 2008

The submission from the New Zealand Salmon Anglers Association Incorporated was received after the deadline, but was accepted.

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

2. Review of Submissions

2.1. Robert Sowman, New Zealand Fish & Game

This submission questioned whether the suggested risk mitigation measures provided adequate protection from diseases.

The MAFBNZ risk analysis process is designed to be scientifically robust, resulting in measures in the import health standard that manage any risks from the defined commodity. This risk analysis was reviewed by experts both internally and externally before the draft was released for consultation.

The submitter expresses concerns over some of the suggested sanitary measures, and it seems appropriate to explore some of these in greater detail.

The draft risk analysis examined a wide range of organisms associated with *Pangasius* species that were of potential concern to New Zealand. Through a well defined process, explained in the draft risk analysis document, each of these organisms was considered against eleven criteria to determine if they should be assessed in more detail. Those chosen for further consideration were then assessed for the likelihood of entry into New Zealand with the commodity, exposure to people and animals here and the likelihood of establishment in this country. If all of the above are considered likely to occur then an assessment of consequence is carried out. Specific sanitary measures are then considered based on these more detailed assessments. In addition, as good biosecurity practice, a number of general sanitary measures may also be considered.

It is important to remember that, in the case of this commodity (frozen, skinless, boneless fillet meat) from Vietnam, none of the potential hazards that were taken forward for closer examination was ultimately considered to be an actual hazard and thus it was determined that there were no specific sanitary measures necessary. However, as indicated above, it was concluded a number of general sanitary measures consistent with the general requirements of the World Organisation for Animal Health (OIE) Aquatic Animal Health Code may be appropriate to ensure, where necessary, adherence with the commodity definition.

In this case the general sanitary measures are designed to ensure:

1. That product is derived from fish reared and processed in premises under the control of the Competent Authority of Vietnam, which has regulations controlling the industry and governing disease reporting.
2. That product is not derived from fish clinically diseased, nor from a population subject to emergency harvest. This is to minimise the likelihood of fish that are subclinically infected with a disease of significance being used for the commodity.

It is important to note that the individual risk assessments concluded that, even for those organisms considered to be of greatest significance and therefore assessed in detail, the likelihood of entry or exposure and establishment was negligible. This conclusion is not completely unexpected, given the nature of the commodity. The level of processing of the fish renders this type of commodity an inherently low risk product. This fact is recognised globally by trading partners and by the OIE Aquatic Animal Health Code. No pathogens, therefore, required specific sanitary measures. In line with the agreement on the

implementation of the sanitary and phytosanitary agreement (SPS Agreement) of the World Trade Organisation, MAFBNZ cannot scientifically justify specific disease testing or surveillance regimes, targeting specified pathogens, for the farms in Vietnam.

New Zealand, as a trading nation, builds relationships with the Competent Authorities of trading partners. These Competent Authorities, as representatives of their sovereign governments, have an international obligation to report disease status transparently, and complete zoosanitary certificates accurately.

There are no recommended changes to the risk analysis as a result of this submission.

2.2. Nguyen Nhu Tiep, Ministry of Agriculture and Rural Development of Vietnam

This submission, from the Competent Authority of Vietnam, indicates that the transparent manner and processes involved in the development of risk analyses and import standards is appreciated and consistent with our international obligations.

There are a number of comments specific to some of the potential hazards identified, and these will be considered individually, however the comments:

- concentrate on the distinction between potential and actual hazards; and
- require consistency across exporting countries and commodities.

The submitter indicates apparent contradictions between the outcomes of the individual risk assessments and the conclusion of the risk analysis. However, this situation is actually not contradictory. The conclusion section of the draft risk analysis summarises the whole risk analysis process, and the eight organisms listed as potential hazards were identified as such in the preliminary phase of the draft risk analysis. As a result of carrying out individual risk assessments of each organism, no organisms were considered to be actual hazards in this commodity. This is also indicated in the conclusion:

“None of the eight primary potential hazards were identified as requiring specific risk management measures; the process of filleting and the period of time frozen effectively reducing any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”

However, to clarify that none was considered to be an actual hazard, the wording for the final risk analysis will be amended to:

“Following individual risk assessments, none of the eight primary potential hazards were identified as actual hazards in this commodity from Vietnam, thus eliminating any requirement for specific risk management measures. The process of filleting and the period of time frozen effectively reduce any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”

Specific comments regarding individual organisms are considered below:

1. Iridoviruses:

Whilst there are no specific reports of iridoviruses from *Pangasius* spp. in Vietnam, iridoviruses have been reported from other fish species in other countries in Southeast Asia. Given the propensity for iridoviruses to exist as pools of quasispecies in aquatic animal populations and their recognised ability to easily cross between species, it was considered necessary to examine these organisms more closely in the draft risk analysis. In addition, MAFBNZ is considering the imposition of measures on iridoviruses in imported ornamental fish, and exotic iridoviruses are listed in New Zealand as unwanted organisms under the Biosecurity Act 1993. One type of iridovirus, namely lymphocystivirus, is considered to be present in New Zealand. Thus, only exotic strains of iridovirus, including Red Sea bream iridovirus and epizootic haematopoietic necrosis virus, were considered in the individual organism risk assessment.

Nevertheless, as a result of the individual risk assessments it was concluded in the draft risk analysis that iridoviruses were not considered to be an actual hazard in the commodity, and therefore no specific sanitary measures were proposed.

2. *Edwardsiella ictaluri*

Once again, as a result of the risk assessment, this organism was determined not to be an actual hazard in the commodity and no specific sanitary measures were proposed in the draft

risk analysis. Any import health standard for this commodity from Vietnam would therefore not contain any measures specific to this organism.

3. *Aeromonas salmonicida*

As one factor in the consideration of this organism, both typical and atypical strains of this organism are considered exotic to New Zealand. It is also reported that non-salmonid fish may be non-clinical carriers of typical *A. salmonicida*, often when cohabiting with farmed salmonids. Thus, the absence of reports of clinical disease associated with *A. salmonicida* in *Pangasius* species is an important factor to consider, but not the only one. Given the importance of salmonids to New Zealand, the exotic nature of the pathogen, the presence of farmed salmonids in Vietnam and the potential impact on New Zealand fish of any incursion, it was considered appropriate to assess this organism further in a risk assessment.

However, the thorough risk assessment resulted in a conclusion that the pathogen represented a negligible risk in this commodity from Vietnam and no specific sanitary measures were proposed.

4. *Flavobacterium* species

Expert international peer review of an early draft raised the attention of MAFBNZ to reports of a highly pathogenic genomovar of *F. columnare* [Michel et al. (2002), J. Fish Dis., 25, 253-263] from Asia. *F. columnare* is considered to be present in New Zealand. However, one of the criteria for considering an enzootic organism further is where there is a clearly more pathogenic strain outside New Zealand. In this case it was considered that it was appropriate to consider this more pathogenic strain further. Once again, it was concluded, after a thorough risk assessment, that the organism represented a negligible risk in the commodity from Vietnam and no specific sanitary measures were proposed.

5. *Kabatana arthuri*

This organism, which is exotic to New Zealand, has been reported from farmed pangasid catfish. Assurances of freedom from infection in an exporting country are reassuring, however, it was determined to more fully assess any risks from the organism were it to be present unknowingly in an exporting country. The parasite may be present subclinically and would not necessarily be detected unless targeted surveillance was employed. This inclusive approach has enabled MAFBNZ to determine that the organism, regardless of the health status of the exporting country, would represent negligible risk in this commodity. Thus, the risk analysis indicated that no specific sanitary measures are necessary.

6. *Aphanomyces invadans*

This organism was subjected to a thorough risk assessment which determined that it posed a negligible risk in this commodity. Therefore no specific sanitary measures were proposed in the draft risk analysis. Different commodities would, of course, be subject to their own risk assessment and the application of scientifically-based sanitary measures for *A. invadans* could be proposed if considered necessary.

MAFBNZ notes the submitter's comments regarding the necessity for the consistent application of sanitary measures across commodities so as not to discriminate against product from Vietnam, and to meet World Trade Organisation (WTO) standards. For any commodity, the sanitary measures required by New Zealand are based on scientific risk analyses considering both the commodity and the proposed exporting country. Where analyses show the risks to be identical between countries and commodities, the specific sanitary measures would also be of identical stringency.

In this case, no specific sanitary measures were suggested for this commodity from Vietnam. The general sanitary measures suggested are consistent with good biosecurity practice and general provisions of the OIE Aquatic Animal Health Code.

MAFBNZ thanks the submitter for providing information regarding the standards of potable water required in fish processing facilities.

As a result of this submission, it is suggested that minor changes are made to the wording of one paragraph in each of the conclusion and the executive summary. The paragraphs worded:

“None of the eight primary potential hazards were identified as requiring specific risk management measures; the process of filleting and the period of time frozen effectively reducing any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”

will be amended to:

“Following individual risk assessments, none of the eight primary potential hazards were identified as actual hazards in this commodity from Vietnam, thus eliminating any requirement for specific risk management measures. The process of filleting and the period of time frozen effectively reduce any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”

2.3. Ron Dougherty, New Zealand Salmon Anglers Association Incorporated

This submission raises a number of issues regarding the sustainable management of New Zealand fisheries, discontent with the quality of imported fish fillets, suggestions regarding labelling of imported product and concerns regarding the environment of potential fish rearing areas in Vietnam.

MAFBNZ notes the submitters concerns in all these areas; however, the MAFBNZ remit is limited to risk organisms in imported product. Concerns regarding the sustainability of New Zealand's managed fisheries would be more effectively made to the Ministry of Fisheries.

It could be considered that consumer pressure would be most effective where the perceived quality of the imported product is poor. The submitter indicated that he would not again purchase the particular product mentioned, and it could be imagined that the New Zealand public would act likewise if they found the product unpalatable.

Labelling of product, similarly, is outside the remit of MAFBNZ and this risk analysis.

In considering food safety issues associated with the importation of this commodity MAFBNZ must adhere to the Biosecurity Act ("The Act"). The Act however restricts our consideration to "organisms" that may be present in the "risk good". The definition of "organism" in the Act does not include chemical contamination, thus the risk analysis cannot formally address the issue of chemical residues in an imported commodity. However, as indicated above, it should be noted that the New Zealand Food Safety Authority (NZFSA) was consulted during the drafting of this document with the following response:

"The New Zealand Food Safety Authority (NZFSA) has made a preliminary evaluation of the food safety risks associated with the importation of skinless, boneless fillet meat of basa from Vietnam. While it has no specific food safety concerns associated with import of these products, it does have general concerns about hazards that may be present in the commodity, particularly chemical hazards such as antimicrobial drugs, residues of agricultural compounds, and heavy metals. While there are currently no specific food safety standards or import requirements that would apply to basa from Vietnam, if imported they would need to meet the requirements of all relevant food legislation, including the Food Act 1981 and the Australia New Zealand Food Standards Code. In future, additional requirements may apply to these products as NZFSA is in the process of implementing the outcome of a major review of its imported food programme. Implementation will occur over the next few years and will involve grouping imported foods into one of three categories of regulatory interest with different requirements and clearance options applying to each category. Foods may also be put on a "scanning list" and subjected to additional monitoring (including sampling and testing) should this be warranted. Further information on NZFSA's import requirements and the new imported food programme is available on NZFSA's website at <http://www.nzfsa.govt.nz/imported-food/index.htm>."

This information was presented in Section 2.1 of the draft risk analysis, for the information of all stakeholders.

There are no recommended changes to the risk analysis as a result of this submission.

3. Conclusions

Following consideration of submissions received during public consultation on the “*Import risk analysis: Frozen, skinless and boneless fillet meat of Pangasius spp. from Vietnam for human consumption*” the following are recommended changes to the content of the risk analysis:

1. the paragraphs in the executive summary and conclusion, worded as follows:
“None of the eight primary potential hazards were identified as requiring specific risk management measures; the process of filleting and the period of time frozen effectively reducing any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”

will be amended to:

*“Following individual risk assessments, none of the eight primary potential hazards were identified as **actual hazards in this commodity from Vietnam, thus eliminating any requirement for** specific risk management measures. The process of filleting and the period of time frozen effectively reduce any pathogenic burden to levels where the likelihood of exposure and establishment in New Zealand is negligible.”*

to clarify that none of the potential hazards was considered to be an actual hazard in the defined commodity from Vietnam.

The suggested final sanitary measures can be expressed as:

“General sanitary measures are considered necessary:

- to ensure that the likelihood of clinically or subclinically diseased fish being harvested for processing is minimised:
 - both the farm of origin and the processing facility must be registered with the Competent Authority of the country in question; and
 - fish processed must be derived from broodstock resident in the exporting country; and
 - fish showing clinical signs of disease, septicaemia or skin ulceration must not be harvested for processing into this commodity; and
 - fish harvested must not be subject to emergency slaughter for disease reasons, regardless of whether or not they display clinical signs themselves.
- to avoid contamination of the commodity with exotic foodborne pathogens:
 - only potable water should be used during the processing of the fish into fillet meat.
- to ensure compliance with the freezing and transport time regime included in the commodity definition:
 - To ensure that the inactivation of organisms that is inherent in this freezing process does occur it must be determined that the commodity was frozen and held at -18°C, or lower, for at least 7 days (168 hours) before a biosecurity clearance is issued.”

Appendix 1: Copies of Submissions

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1. Robert Sowman, Fish & Game New Zealand



14 April 2008

Martin Van Ginkel,
Ministry of Agriculture and Forestry,
PO Box 2526,
WELLINGTON

Dear Martin

IMPORT RISK ANALYSIS: FROZEN, SKINLESS AND BONELESS FILLET MEAT OF PANGASIU SPP. FISH FROM VIETNAM FOR HUMAN CONSUMPTION

I wish to respond to your request for submissions to be received no later than 30 April 2008 on the above import risk analysis.

Of most concern to Fish & Game New Zealand is the inadequate protection from disease risk. The relevant draft certification is as follows: Import Health Standard for Specified Processed Freshwater Fish for Human Consumption FISFILIC.SPE27 February 2008 page 6 of 6.

I have underlined what we consider to be a key clause in the analysis under *IV. Zoosanitary Information*, point 2. “The product is derived from fish that were not slaughtered as **an official disease control measure** as a result of an outbreak of disease.”

Fish & Game New Zealand would rather that they be required to advise if there are any one of a number of potential disease outbreaks from the source facility or in its vicinity (MAF Biosecurity should list likely diseases). Any outbreaks should mean they cannot import the product. Leaving this to ‘official’ recognition of disease and the control thereof is too risky. It would allow them to possibly ignore any disease which they do not officially recognise or even look for in any monitoring.

Not all diseases present clinically, or by way of septicaemia, or skin ulceration. Therefore some periodic testing for disease would also seem essential.

Kind regards

A handwritten signature in black ink that reads 'Robert Sowman'.

Robert Sowman
Policy & Planning Manager

2. Nguyen Nhu Tiep, Ministry of Agriculture and Rural Development of Vietnam



MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT OF VIETNAM
The National Agriculture, Forestry and Fisheries Quality Assurance Department
(Renamed from the National Fisheries Quality Assurance and Veterinary Directorate)
Add.: 10 Nguyen Cong Hoan, Ba Dinh, Ha Noi, Viet Nam
Tel. 84.04.; 8310983 Fax: 84.04.8317221 E-mail: nafiqaved@mofi.gov.vn

NAFIQAD

Ref.Nº: /QLCL - CL1

Hanoi, April 30, 2008

To: Mr. Martin Van Ginkel,
Ministry of Agriculture and Forestry New Zealand.

On behalf of the National Agriculture, Forestry and Fisheries Quality Assurance Department (NAFIQAD), Vietnam Ministry of Agriculture and Rural Development, I would like to present its compliments to you and provide you with our comments on the Biosecurity New Zealand's draft Import Risk Analysis (IRA) for frozen, skinless and boneless fillet meat of *Pangasius* spp. fish from Vietnam for human consumption. Details are as follows:

1. NAFIQAD highly appreciates the New Zealand's transparency in setting up sanitary measures for imported animal products based on import risk analysis (IRA) as well as consulting with related parties for the draft IRA.
2. Three steps for risk analysis (hazard identification, risk assessment and risk management) applied by Biosecurity New Zealand are in compliance with the OIE Aquatic Animal Health Code (Item 1.4. Import risk analysis).
3. In relation to identified potential hazards:
 - 3.1. Iridoviruses:

Based on hazard identification and risk assessment, the Biosecurity New Zealand stated that the virus including iridoviruses as "not necessary to consider EHN, IHN, SVCV, VHSV, ISAV, RSIV or KHV further" (page 11 section 3.2) and "no further assessment is required and no specific sanitary measures are warranted" (page 19 section 4.1). It contradicts with the conclusion in section 5 "eight potential hazards were identified from the list of organisms of potential concern and subjected to further risk assessment. These were iridoviruses, ...". Otherwise, iridoviruses were found in different fish species, but there is no report indicating that iridoviruses were presented in *Pangasius* spp. in Vietnam, while it presented in New Zealand. It is requested to not list iridoviruses for further risk assessment.

3.2. *Edwardsiella ictaluri*:

Similar to section 3.1 above, the Biosecurity New Zealand stated that for *Edwardsiella ictaluri* "no further assessment is required and no specific sanitary measures are warranted" (page 22 section 4.2). This statement contradicts with

the conclusion in section 5 “eight potential hazards were identified from the list of organisms of potential concern and subjected to further risk assessment. These were *Edwardsiella ictaluri*, ...”. In addition, *Edwardsiella ictaluri* has been presented in catfish *Pangasius hypophthalmus* in both Vietnam and Indonesia (Crumlish *et al.* 2002, Yuasa *et al.* 2003). Large quantities of catfish are annually moved from southeastern states of the USA, where *E. ictaluri* is enzootic, to other states without any reports of the movement of the disease. In case the Biosecurity New Zealand required sanitary measures to control this hazard in frozen, skinless and boneless fillet meat of *Pangasius* spp. fish from Vietnam for human consumption, it is also requested for Biosecurity New Zealand to apply sanitary measures for all *Pangasius* spp. products from Indonesia and other catfish products from United States, ... to avoid the discrimination and be in compliance with WTO requirements.

3.3. Atypical *A. salmonicida*: in accordance with analysis in section 4.3 of the Biosecurity New Zealand, atypical *A. salmonicida* is in wide range of fish species and global distribution but there is no report on the presence of *A. salmonicida* in *Pangasius* spp. We would request the Biosecurity New Zealand to not do further risk assessment on *A. salmonicida* in *Pangasius* spp..

3.4. *Flavobacterium* spp.: *Flavobacterium columnare* is presented in New Zealand but not in *Pangasius* spp. in Vietnam. Therefore, it is not reasonable to mention it in the list of potential concerns. Moreover, following hazard identification and risk assessment, the Biosecurity New Zealand assessed that for *Flavobacterium* spp “no further assessment is required and no specific sanitary measures are warranted” (page 26 section 4.4). It contradicts with the conclusion in section 5 “eight potential hazards were identified from the list of organisms of potential concern and subjected to further risk assessment. These were *Flavobacterium* spp., ...”. It is requested to not list *Flavobacterium* spp for further risk assessment.

3.5. *Kabatana arthuri*: Although *Kabatana arthuri* has been found in Thailand but there is up to date no report on the presence of *Kabatana arthuri* in Vietnam. Moreover, in accordance with hazard identification and risk assessment, the Biosecurity New Zealand assessed that “no further assessment is required and no specific sanitary measures are warranted” (page 28 section 4.5). It contradicts with the conclusion in section 5 “eight potential hazards were identified from the list of organisms of potential concern and subjected to further risk assessment. These were *Kabatana arthuri*, ...”. It is requested to not list *Kabatana arthuri* for further risk assessment.

3.6. *Aphanomyces invadans*: As over 100 fish species are affected with *Aphanomyces invadans*, in case the Biosecurity New Zealand applied sanitary

measures to control this hazard, it is also requested for the Biosecurity New Zealand to apply similar sanitary measures for all products originated from these 100 species imported to New Zealand.

3.7. In relation to the water used for catfish production: :

The water used for processing fish fillet in Vietnamese processing establishments meets Vietnamese regulation on quality of portable water equivalent to Directive (EC) No. 98/83/EEC. According to the above regulation the water used in processing fish fillet in Vietnam to be controlled by processing establishments to ensure free of any pathogenic microorganisms for human health e.g. *Salmonella* spp., *Vibrio cholerae*.

Thank you and hope for further cooperation in the future.

Yours sincerely,

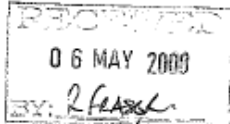
Nguyen Nhu Tiep
Deputy Director General of
NAFIQAD

Cc:

- Vietnam Trade Office in New Zealand;
- Ms. Sally Griffin – Ministry of Agriculture and Forestry New Zealand.

3. Ron Dougherty - New Zealand Salmon Anglers Association Incorporated

New Zealand Salmon Anglers Assoc Inc
P.O. Box 1113 CHCH



30/4/2008

Biosecurity NZ
Wellington

Home ph 338 2479.

Re. Importation of Pangasius spp. fillet meat
from Vietnam

Since I last submitted to Biosecurity NZ about
the importation of Tilapia fillet meat from China
& Brazil, I have the following observations
for your consideration.

①. The quota for commercial fishing trawlers
handling red cod in (A3), East Coast South
Island has been considerably reduced

②. The amateur recreational fishing bag limit
for Red Cod in the same area has been
reduced to 10 fish/day.

On the last weekend of January 2008
I travelled as a verifier on a commercial
fishing trawler which trawled from Waitaha (north of

The Waimakariri River to what appeared to me to be out to sea off the Conway River, we overnighed by steaming slowly around in big circles and after dawn broke we hauled back towards Wairarapa on the same haul line as per the laid track on the computer, Time at Sea, what to what, 37h

The catch would hardly have paid for the ^{crews} food & fuel for the trawler. Bottom trawling for the target species resulted in a fair proportion of the target species having to be discarded as too small to have any market value, (but they were still dead, dead, dead,) Many unmarketable species and trash fish of no value.

To me, a sure sign of a fishery in trouble, —

But I don't think the solution is to import fish fillets to replace a lost

fillety. →

ITEM 2. In early February my wife came back from the Supermarket with a carton of Fish Fillets (Ready to Heat & Eat). Yellow White & Blue Carton, Large Lettering "PACIFIC WEST" extremely small print on pack. - "packed in Malaysia" my comment - the batter was nice, the "fillet" had an extremely strong unpleasant fishy taste - the "fillet" was mushy. They had an adverse effect on the pair of us the next day - flatulence. Not even our garbage guts if a house cat would eat them!! Neither will we again. Buried the rest in the garden!!

So what to do!! Retire a few large inshore areas & hope they will recover! Everyone out, including

recreational fishers.

- ② Try to farm a few of our own inshore species,
- ③ Mince all discarded fish & hopefully feed the small stuff, and not the rattail & dogfish that inhabit the bottom.

So, In conclusion.

Make all Imported fish for consumption carry a larger label.

- ① As to Source of fish stock
- ② Where packaged

Should the imported product be used as a fillet for consumption in the catering restaurant & hotel industries etc, this fact to be printed on the menu.

i.e. The potential diner to be aware of the source of his fish dinner.

As to the importation of the fish fillets
from Vietnam

Bearing in mind that the country
was the scene of a prolonged & bitter
war, using all the worst technology
of "modern" warfare.

eg. Agent Orange, Napalm / Phosphorous
Chemical contamination of
the land & water, Fuel Dumps,
Degrading munitions.

ETC,

Fillets to be tested at random
for carcinogens & contaminants
Personally I don't think these fillets
should be imported, there are too many
unanswered questions.

Hopefully, if the some of the above suggestions
are implemented, I, and my family & friends
and all other of our contacts will be able to avoid
these fish

Ron Down, herty