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ANIMAL BIOSECURITY POLICY MEMORANDUM 2002/21

INTERIM BIOSECURITY MEASURES FOR PILCHARDS AND MACKEREL

This Animal Biosecurity Policy Memorandum (ABPM) announces adoption of interim import conditions for pilchards, mackerel and closely related species.

In December 2001, Biosecurity Australia notified stakeholders through ABPM 2001/36 of the start of a review of biosecurity policies for importing pilchards, mackerel and closely related species after Viral Haemorrhagic Septicaemia Virus (VHSV) was identified in pilchards and mackerel from Californian waters. Subsequently, Biosecurity Australia sent a technical brief to stakeholders and convened a public meeting in Adelaide on 20 February (ABPMs 2002/01 and 2002/04).

On 11 April 2002, after considering available scientific information and reviewing stakeholder submissions, Biosecurity Australia issued ABPM 2002/14 proposing interim conditions and announcing that it would conduct a more detailed evaluation of Australia's policy for VHSV in the context of imported finfish intended for direct introduction into the aquatic environment.

The proposed interim conditions required *Sardinops* spp and *Scomber* spp to be listed as 'specified' and subject to associated import controls. Stakeholder comment on the proposed interim measures were sought by 26 April 2002. Eleven submissions were received. These submissions, to varying degrees, either support or reject the proposed interim measures. No substantive new technical information was presented. Those submissions not marked confidential are available for viewing at Biosecurity Australia offices in Canberra. Interested parties should contact the officer nominated below.

Policy decision

After considering the stakeholder comments, the Director of Quarantine has decided that pilchards, mackerel and closely related species from all sources other than New Zealand be classified as 'specified' species and be subject to associated import controls. The Australian Quarantine and Inspection Service (AQIS) has adopted the interim measures and all permits for importation of *Sardinops* spp and *Scomber* spp for human consumption will require that fish be officially certified as:

- being processed in premises approved by, and under the control of, the Competent Authority; and
- being eviscerated; and
- being inspected under the supervision of the Competent Authority; and
- being free from visible lesions associated with infectious diseases; and

• having its head and gills removed and its internal and external surfaces thoroughly washed.

For these purposes, New Zealand is considered to have at least an equivalent health status to Australia with respect to non-salmonid marine finfish and AQIS will allow the continued importation of non-salmonid marine finfish covered by a certificate of origin issued by the New Zealand Ministry of Agriculture and Forestry.

Existing import permits that include *Sardinops* spp and *Scomber* spp will be revoked and re-issued as necessary. Importation of 'specified' finfish for bait or aquaculture purposes or importation for human consumption without meeting the above minimum requirements would not generally be permitted unless:

- the importer can make a compelling case that the use of the product in Australia can be controlled with a high degree of certainty, and
- that this use does not pose an unacceptable risk. AQIS, in consultation with Biosecurity Australia and relevant State Governments, may consider similar arrangements to those applied to herring (*Clupea* spp.), also based on VHSV related risk, or other risk management proposals.

Importers seeking to import whole round pilchards, mackerel and closely related species would need to make a science-based submission to AQIS supporting their application for a permit. The application would need to provide details of the product to be imported; its intended end-use; and other information required by AQIS to make an informed assessment of the quarantine risk presented by the proposal. An AQIS guideline on minimal requirements for such an application is attached.

Existing policy with respect to mitigating VHSV risks using end-use controls based on water temperature will be continued pending the outcome of Biosecurity Australia's review.

Transitional arrangements

Based on permit information, product already on-route to Australia will be allowed entry provided compliance with import requirements existing at the time of export.

Next Steps

The interim measures will take with effect from today. We expect that a draft policy paper on VHSV will be released for stakeholder comment within the next few months. Stakeholder technical comments on VSHV are still welcome.

Confidentiality

Respondents are advised that, subject to the Freedom of Information Act 1982 and the Privacy Act 1988, all submissions received in response to Animal Biosecurity Policy Memoranda will be publicly available. Comments may be listed or referred to in any papers or reports prepared on the subject matter of the Memoranda.

The Commonwealth reserves the right to reveal the identity of a respondent unless a request for anonymity accompanies the submission. Where a request for anonymity does not accompany the

submission the respondent will be taken to have consented to the disclosure of his or her identity for the purposes of Information Privacy Principle 11 of the Privacy Act.

The contents of the submission will not be treated as confidential unless they are marked 'confidential' and they are capable of being classified as such in accordance with the Freedom of Information Act.

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AUSTRALIAN QUARANTINE AND INSPECTION SERVICE GUIDELINES FOR SCIENTIFIC/TECHNICAL SUBMISSIONS FOR IMPORT OF NON-VIABLE, NON-SALMONID FINFISH

The following is a guide for importers seeking to make a submission to AQIS regarding the importation of a finfish product for which AQIS would <u>not</u> generally issue an import permit.

Background Information

Specified finfish species were identified by AQIS in the import risk analysis on non-viable salmonids and non-salmonid marine finfish (July 1999) and more recently for pilchards and mackerel (*Sardinops* spp and *Scomber* spp). These non-salmonid species were determined as susceptible to at least one of the following diseases/ disease agents of quarantine concern:

- pathogenic aquabirnaviruses;
- infectious pancreatic necrosis;
- red sea bream iridovirus;
- viral haemorrhagic septicaemia;
- Aeromonas salmonicida; and
- Photobacterium damsela piscicida.

Each of the above disease agents may be found in tissues of apparently healthy fish of one or more of the *specified finfish species*. AQIS concluded that inspection alone would be an inadequate quarantine measure to prevent the entry, establishment and spread of these exotic disease agents.

The minimum quarantine risk management measures for the *specified finfish species* are that the fish are officially certified as:

- being processed in premises approved by and under the control of the Competent Authority; and
- being eviscerated; and
- being inspected under the supervision of the Competent Authority; and
- being free from visible lesions associated with infectious diseases; and
- having its head and gills removed and its internal and external surfaces thoroughly washed

The importation of *specified finfish species* that did not meet these minimum requirements would not generally be permitted unless:

- the fish were to undergo further processing/treatment in Australia while under quarantine control so that Australia's level of quarantine protection was met (eg petfood manufacture, smoking for human consumption); or
- the fish were to be managed in a manner that would meet Australia's level of quarantine protection. Such proposals for alternative risk management measures would need to be supported by a scientific/technical submission detailing how the importation could be appropriately managed.

Scientific/technical submissions

In arriving at the conclusions in the import risk analysis, AQIS acknowledges that there may be relevant scientific information available of which AQIS is not aware, particularly in non-English speaking countries. Such information may in certain cases significantly alter the quarantine risk presented by *specified finfish species* and may enable product derived from such fish to be imported in a form other than that generally required and yet still be consistent with Australian quarantine requirements. AQIS will consider such information on a case-by-case basis.

Similarly, there may be alternative risk management measures, different to those minimum requirements listed above, which provide an equivalent level of risk reduction. As such, if an importer is not able to meet existing quarantine conditions, he/she can make a scientific submission to AQIS proposing alternative measures that will provide at least the same level of quarantine security.

Submissions proposing alternative risk management measures should address two main components:

- 1) The effectiveness of the risk reduction measure/s that you intend to apply.
- 2) A proposed means by which AQIS could ensure compliance with the proposed risk reduction measures.

<u>For example</u>, an importer wishing to import pilchards (*Sardinops sagax*) from California for use in a tropical commercial fishery may propose the that imported product will only be used by commercial fishers in waters above $15^{\circ}C^{1}$.

The importer would need to present technical information supporting an argument that the above measure would reduce the risk to an acceptable level².

Next, the importer would need to propose a system by which AQIS could ensure compliance, i.e. be satisfied that the above measure is actually used. In this instance, it may be sufficient to show that all imported product is sold only to AQIS-registered fishers who's activities are restricted to areas where water temperature is always above 15°C. Mechanisms for AQIS audit of importer/end-use activities may be facilitated through compliance agreements involving record keeping, spot-checking and other such arrangements. Details of possible mechanisms for ensuring compliance may be discussed with AQIS.

The above example has been provided as a **guideline only**, without prejudice to any decision by AQIS on the acceptability of such a proposal. Each application should be submitted to AQIS and will be considered by AQIS on a case-by-case basis. Biosecurity Australia provides technical advice to AQIS and as such will likely be involved in evaluating the scientific submissions and providing advice to AQIS.

¹ The validity of this temperature limit will continue to be accepted by AQIS until the review currently underway is completed.

 $^{^{2}}$ In the case of this particular measure, ie usage in waters above 15°C, no supporting evidence would be required as the validity of this measure has already been accepted by AQIS/Biosecurity Australia.

A scientific submission should also contain the following information at a minimum, as well as any additional information relevant to the particular case.

- 1. General Information
- commodity to be imported (species of origin, form of commodity)
- source country/ies
- whether product is derived from wild-caught/ farmed fish
- intended end-use, intended usage patterns (eg is demand seasonal or all year-round).
- 2. Pre-Export Information (Country of Origin)
- Disease monitoring and surveillance programs:
 - national/regional
 - information on testing and recorded prevalence of disease agents in source population of specific quarantine concern to Australia
- Water temperatures where fish are caught/farmed
- If farmed, details of:
 - other finfish species farmed in adjacent waters (if any)
 - wild fish in the same family sharing common waters
 - feed used
 - vaccination programs (if any)
 - any other treatments used for disease control
- 3. Post-arrival Information (in Australia)
- Intended distribution (eg restricted in geographic distribution or nationwide; general or restricted availability)
- Storage/handling procedures prior to distribution
- 4. *Contact Details*
- Contact details should be provided for scientists (and other persons) who provide information that AQIS may wish to verify/clarify. References for scientific articles and publications should also be provided.