

31 May 2009

Address

Dear Sir / Madam,

**Re: Review of Biosecurity Risks Associated with Gourami Iridovirus and Related Viruses**

I refer to the draft report recently released by Biosecurity Australia regarding the importation of freshwater ornamental fish: review of the biosecurity risks associated with gourami iridovirus and related viruses of March 2009.

It is heartening to know that AQIS and Biosecurity Australia are starting to take a positive stance in addressing the importation of diseased ornamental fish into Australia however it is concerning that the conclusions from the report above appear to provide an “either/or” option with respect to achieving Australia’s ALOP. Specifically our concern relates to implementing the control as being allowing importation of ornamental fish “sourced from countries, zones or compartments determined to the satisfaction of Australian government authorities to be free of iridoviruses of quarantine concern”.

I need to bring to your attention two (2) recent incidents that demonstrate that:

- a. That there is no guarantee that the country, compartment or zone of origin can be stringently policed to the quarantine requirements of the receiving country.
- b. That the government authorities of the countries of origin do not have competent staff to recognise and control the exportation of diseased ornamental fish.

Recently the European Union has deemed a lack of confidence to Malaysia as a country of origin by suspending the importation of ‘coldwater’ cyprinids from Malaysia. This was brought about by the European Commission Health & Consumers Directorate-General in their Final Report of a Mission Carried Out In Malaysia From 08 April To 18 April 2008. They reported that Animal Health official controls were not documented on ornamental fish farms, there was no active surveillance monitoring in place in ornamental fish farms for the relevant OIE notifiable diseases. As not all fish farms are under the supervision of the CA and there is no obligation to keep records of fish entering/leaving the farms and to record/report cases of increased mortality the CA cannot guarantee a sufficient level of control on the Animal Health requirements for fish. In particular they could not guarantee that no outbreak of fish disease had occurred in the last six months prior to dispatch. This report has been published on the Internet at: <http://ec.europa.eu/food/fvo/irsearch.en.cfm>

The other incident relates to the importation of ornamental goldfish from China to the United Kingdom. On the 27<sup>th</sup> March 2009, 19 boxes containing 11,110 ornamental goldfish arrived in the United Kingdom and were cleared at Manchester Border Inspection Post. The consignment arrived with appropriate health certification from the Chinese Authorities. Upon being cleared of the inspection post 3 boxes remained in the UK with the remaining 16 being transhipped to Ireland. It is understood that the Department of Agriculture and Rural Development in Northern Ireland destroyed this consignment and subsequently the UK consignment due to the presence of Spring Viraemia of Carp.

The above examples illustrate the lack of confidence Western countries have rightly shown with regards to the country of origin of having a competent authority to manage/verify that the fish to be imported are disease free. Australia cannot afford to hand over its biosecurity to third world countries to manage on its behalf. How is it with any confidence that these countries of origin can provide assurance of disease free fish

stock when they do not have the means to actually test for it. It is understood that Biosecurity has a difficult task with free trade verses biosecurity of its borders however Australian native species as well as local fish breeders are forever going to be on the back foot when there is a conflict of interest with the country of origin where they are left to decide what is allowed to come into our country. We need to take control and make the decisions of what is allowed to enter Australia and not rely on external countries to do this.

We want to see Australia undertake compulsory batch testing on all fish post-arrival with fish to be found free of corresponding iridoviruses as well as any other pertinent viruses identified abroad before moving out of quarantine. It is felt that having the country of origins being free of iridovirus to the satisfaction of the Australian government is a good control measure however it is not enough to act as a stand-alone measure but needs to be complimented and used in conjunction with batch test post-arrival of all imports.

It is disconcerting that a report commissioned by Biosecurity titled Ornamental Fish Testing Project Final Report, published by F.J. Stephens, J.B. Jones & P. Hillier (2006?), has only been released to the public via Biosecurity's Web site only as recently as a few weeks ago. To think that testing associated with this report was only triggered once 25% of a consignment of ornamental fish died during quarantine and demonstrated a vast array of infection. To think of all the other consignments imported into Australia where the imported ornamental fish were infected, however showed less than 25% mortality. It is evident from this report that ornamental fish are being imported into Australia carrying a whole host of bacteria, viruses and parasites, that AQIS and it's agencies are ill equipped to recognise and make a determination of the risk posed. The recommendations in this report should have been implemented 3 years ago.

Australia currently has disease free ornamental fish stock and there is no reason why a whole selection of ornamental fish can not be bred within Australia and to be competitive in the export market. Given that Australia is relatively disease free, one would think that the standard of quarantine would be the most stringent, effective and transparent in the world and yet we are still unable to competently manage our borders.

It is hoped that Biosecurity and AQIS are now currently moving forward with the recommendations listed in the draft report by Biosecurity Australia, however that they are also tightening their view and requirements of certification for the importation ornamental fish of the relevant country of origin.

Yours faithfully,

Steve Wood