Aquatic Commission- October Report

USA COMMENTS (indicated in blue)

GLOSSARY

Feed

means any ~~material~~ product (single or multiple) composed of ~~whether~~ processed, semi-processed or ~~raw~~ unprocessed mineral, plant or animal material, as well as live organisms, that is intended for use as a substantial source of nutrients to be fed directly to *aquatic animals*.

Rationale: The suggested edits include some substances which maybe a necessary component of feed that may not be obtained from animal or plant material, such as minerals.

~~*Live feed*~~

~~means live farmed or wild caught animals and algae used as *feed* for *aquatic animals*. Live feed is often fed to *aquatic animal* species at an early life-stage and to *aquatic animal* species that have been cultured for a relatively short time.~~

Aquatic animal health professional

means an individual holding a tertiary (university) level qualification in animal sciences and who has had post graduate training in aquatic animal health or has had several years practical experience in aquatic animal health.

Disease

means clinical ~~or non clinical~~ *infection* with one or more ~~of the~~ aetiological agents ~~of the *diseases* referred to in the *Aquatic Code*~~.

Rationale: We suggest deleting “non-clinical” and keeping the proposed strike-outs. The definition as proposed would include animals that are not diseased but merely contain a pathogen that might under some conditions cause disease. Some pathogens might never cause disease because the conditions would never occur. The proposed definition is inconsistent with current veterinary understanding about host-pathogen-environment relationships (disease does not occur even when a pathogen is present unless there is a complement of other circumstances such as a susceptible host). The proposed definition would also include pathogens not currently regulated by the OIE opening the door for the prohibition of aquatic animal trade because all animals are likely to carry a bacteria or virus that under some circumstance could cause disease. By including the mere presence of an aetiological agent as the definition of disease, many of the animal proteins consumed domestically and internationally would be considered adulterated because they are diseased. Sale of adulterated foods is prohibited. We elaborate below.

A wealth of scientific and clinical data indicates infection or colonization of an animal by an aetiological agent does not *a priori* mean the animal has a disease. The plain definition of disease from Stedman’s Medical Dictionary is “illness; sickness; an interruption, cessation, or disorder of body functions, systems or organs.” Thus, unless there is a dysfunction of some kind, there is no disease. For example, *Aeromonas* spp. and *Pseudomonas* spp. are bacteria frequently present (colonized) in the gastrointestinal tract of fish yet the fish show no evidence of illness or dysfunction. These bacteria are part of the normal flora but can also be associated with some clinical diseases. They can also be detected on fish gills and on the skin yet only rarely are they associated with disease or epizootics. Similarly, numerous viruses can occur in various organs without evident disease. A good example is channel catfish virus that occurs often in adult fish with no clinical disease but if fry or fingerlings are exposed to an aetiologic agent and under stress, significant mortality and morbidity can occur. There is reason to monitor and regulate pathogens identified in the Aquatic Animal Health Code because it is the most practical way to prevent the spread of potential disease causing agents but it is not medically credible to equate the presence of a pathogen with disease.

By removing “of the diseases referred to in the Aquatic Code,” a much wider door is opened to regulate potential pathogens that do not cause significant mortality or morbidity. The potential regulation of *Aeromonas sobria-hydrophila* is disturbing. These bacteria are ubiquitous in the freshwater environment. It would not be unexpected to find them on the gills or skin of fish.

Additionally, how OIE defines disease could have important ramifications for compliance with food safety expectations or regulations. In the United States, the Food, Drug and Cosmetic Act Section 402 [21 USC §342] defines food as adulterated, “if it is, in whole or in part, the product of a diseased animal.” If the mere presence of a pathogen or aetiologic agent were to constitute a disease, then many animals consumed globally and certainly in the United States would be considered adulterated. In the United States, if a food is adulterated, its sale is prohibited. The United States does not support a definition of disease that is not reflective of current understanding of host-parasite-disease relationships or would create confusion in the public.