

AQUATIC ANIMAL HEALTH STANDARDS COMMISSION

SEPTEMBER 2010 REPORT

USA Comments

CHAPTER 7.4.

**KILLING OF FARMED FISH
FOR DISEASE CONTROL PURPOSES**

GENERAL COMMENTS: When using drugs or chemicals to kill animals, carcasses should not be used for human food or animal feed and contaminated carcasses need to be appropriately disposed of to prevent environmental contamination. We respectfully recommend careful review of this chapter to ensure inclusion of such considerations.

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Article 7.4.6.

Chemical killing methods1. Use of chemicals

- a) ~~chemicals used for killing fish should kill the fish effectively, not merely have an anesthetic effect;~~
- b) ~~when using such chemicals, the operating personnel should ensure that the solution has the correct concentration, and that sea water is used for marine fish species and freshwater for freshwater species;~~
- e) ~~fish should be kept in the chemical solution until they are dead. Fish that are merely anaesthetised should be killed by another method such as bleeding, decapitation or another appropriate killing method;~~

2. Advantages

- a) ~~Large numbers of fish may be killed in one batch;~~
- b) ~~handling is not required until fish are anaesthetised or euthanized;~~
- e) ~~use of chemicals is a non-invasive technique and thus minimises biosecurity risks.~~

3. Disadvantages

- a) ~~May need to be followed by killing if fish are only anaesthetised;~~
- b) ~~some chemicals induce a panic reaction in the fish;~~
- e) ~~care is essential in the preparation and provision of treated water, and in the disposal of water and/or fish carcasses that have been treated with anaesthetic agents.~~

Rationale for amending Article 7.4.6:

The current guidelines regarding the use of chemicals for killing farmed fish for disease control purposes are too vague to ensure the suitability of chemicals as a humane method of killing. This Article fails to identify specific chemicals or categories of chemicals for use to this end. We suggest that this method of killing farmed fish should be included as an option only after further research has been conducted to determine acceptable chemicals for use, or specific types of chemicals for use are named in the guidelines. The OIE draft guidelines acknowledge the risk that “some chemicals induce distress, pain and a panic reaction in the fish” in the Disadvantages paragraph of Article 7.4.6. However, the guidelines fail to identify which chemicals might induce distress, pain, and panic in fish and would therefore be inhumane and unsuitable for use in the killing of farmed fish for disease control purposes.

It also should be noted that the OIE guidelines for the killing of livestock, Chapter 7.6: Killing of Animals for Disease Control Purposes, contain sections describing several methods that use chemicals for the killing of cattle, sheep, pigs, and poultry for disease control purposes. These chemical methods include controlled atmosphere killing (COK) and lethal injections. Chemicals specified for COK are CO₂, nitrogen, and inert gases (e.g. argon). These gases are described in the guidelines in terms of the ratio of gases effective for use in each species and situation. For lethal injections, the guidelines specify the use of “high doses of anaesthetic and sedative drugs”, or “barbiturates in combination with other drugs”.

In summary, the use of chemicals should be removed from this Article unless the “chemicals” or categories of chemicals are specified in the same manner as other OIE guidelines for the killing of animals for disease control purposes.