Annex 16. Item 6.8. – Draft new Chapter 5.X. Movement of ornamental aquatic animals

SECTION 5

TRADE MEASURES, IMPORTATION/EXPORTATION PROCEDURES AND HEALTH CERTIFICATION

**USA COMMENTS IN RED FONT**

CHAPTER 5.X.

MOVEMENT OF ORNAMENTAL AQUATIC ANIMALS

**GENERAL COMMENTS:**  The USA opposes WOAH developing chapters for market segments or specific end-uses of animals. The rationale for this chapter could be equally applicable to other animals including avian, bovine, porcine, caprine, and equine which have “pet” or display market segments.

The rationale provided by the Commission as to why this new chapter is needed could apply to traded terrestrial animals used for food, recreation, or service, and provides no compelling evidence specific to ornamental aquatic animals - “International movement of *ornamental aquatic animals* is characterised by translocation of numerous individual animals comprised of many species of fish, crustaceans, molluscs, and amphibians originating from diverse environments. High turn-over supply chains may involve the aggregation of animals from multiple sources and their dissemination through retail trade as pets, providing opportunities for *disease* transmission. These characteristics of the movement of *ornamental aquatic animals* may present challenges for managing *aquatic animal* *disease* *risks*.”

Furthermore, we do not agree with including factors such as biodiversity and whether a species is considered invasive; these concepts are beyond the scope of WOAH, and their inclusion in this chapter would quickly overwhelm Member Countries attempting to conduct risk assessments, as suggested below, for every ornamental species traded. While there may be exceptions, in most cases traded ornamental aquatic animals are destined for very low to negligible risk end use scenarios. Rather than adopting this chapter, WOAH might consider a chapter on education and risk management strategies that propose more meaningful and achievable approaches than the current content of this chapter. The edits and comments below are intended to clarify what we believe is the intent of this new chapter.

Article 5.X.1.

Introduction

This chapter provides recommendations to address the risk of ~~disease~~ pathogen transmission via the movement of ornamental aquatic animals to prevent entry into a country, zone or compartment that is free from the pathogenic agents of concern.

*Ornamental aquatic animals* may ~~originate~~ be sourced from the wild or from *aquaculture establishments* as farm-raised aquatic animals. Once they have entered the supply chain they may be epidemiologically separated from farmed or wild populations but can be diverted to other end uses for which they were not intended. This may provide a pathway for *disease* transmission and place other populations of *susceptible* *species* at *risk*.

International movement of *ornamental aquatic animals* is characterised by translocation of numerous individual animals comprised of many species of fish, crustaceans, molluscs and amphibians originating from diverse environments. High turn-over ~~S~~supply chains may involve the aggregation of animals from multiple sources and their dissemination through retail trade as pets, providing opportunities for *disease* transmission. These characteristics of the movement of *ornamental aquatic animals* may present challenges for managing *aquatic animal* *disease* *risks*.

**RATIONALE:** Edits to align verbiage with the fact that there is incredible diversity, volume and speed at which the ornamental industry operates.

Article 5.X.2.

Scope

This chapter provides recommendations for managing the ~~disease~~ pathogen *risks* associated with movement of *ornamental aquatic animals* that complement other provisions of the *Aquatic Code*, including the measures specified in the disease-specific chapters.

**RATIONALE:** Edit to clarify that we should be focused on managing pathogen introduction (which may or may not result in disease).

Article 5.X.3.

General principles

Competent Authorities of importing and exporting countries should consider these general principles to minimize the risks of pathogen introduction and spread potentially resulting from the movement of ornamental aquatic animals. These considerations should not require a preceding import risk analysis or declaration of pathogen-specific health status, but rather should be considered as best management strategies for any aquatic animal movement.

General principles are:

1. Prior to the movement of ornamental aquatic animals, the animals should be:
	1. evaluated and determined to be apparently healthy at the time of movement, and
	2. maintained in a manner that prevents exposure to water and animals of lesser or unknown health status, and,
	3. not be experiencing ongoing morbidity or mortality, as described in Article 5.X.5. or as required by importing country requirements;
2. Ornamental aquatic animals intended for movement should be shipped in containers appropriately marked for the care of live animals, have all necessary information provided on the outside of the shipping container, and meet international shipping standards.
3. Shipping water should be sourced from a secure or treated water source that precludes the introduction of and exposure to listed pathogens and is of optimal quality for the species being shipped.
4. Shipping containers and other materials, such as heat or cool packs, should be cleaned and disinfected prior to use, or sourced new.
5. Inner and outer packaging should be sealed to prevent leakage of water and escape of animals.
6. Shipping water and non-disinfectable shipping materials should be disposed of in a secure manner avoiding exposure to resident animals or systems. Whenever possible, ornamental aquatic animals should be monitored in isolation on arrival for any unexplained morbidity or mortality prior to being introduced to destination stocks or systems.
7. Measures should be taken to maintain the welfare of ornamental aquatic animals during packing, transit and upon arrival, including as described in Article 5.X.12.

~~The general principles for the movement of~~ *~~ornamental aquatic animals~~* ~~that should be considered when developing~~ *~~risk~~* ~~mitigation measures are:~~

~~1)~~ ~~the eligibility for the movement of a species (or a taxonomic group of species) should be determined considering its conservation status (e.g. species listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora), and potential biodiversity and ecosystem impacts in the importing country (e.g. potential to become an invasive alien species), as described in Article 5.X.4.;~~

~~2)~~ *~~ornamental aquatic animals~~* ~~intended for international movement should be apparently visibly clinically healthy at the time of movement, not exposed to conspecifics? animals of a lower health status, and should not be from an establishment experiencing recent or ongoing mortality in epidemiologically related lots to the outgoing group, as described in Article 5.X.5.;~~

~~3)~~ *~~risk management~~* ~~measures for~~ *~~listed diseases~~* ~~should be in accordance with the provisions of the disease-specific chapters; , as described in Article 5.X.6.;~~

~~4)~~ *~~risk management~~* ~~measures for non-listed~~ *~~diseases~~*~~, or any measures for~~ *~~listed diseases~~* ~~exceeding those described in the disease-specific chapters, should be justified by~~ *~~risk analysis~~*~~, as described in Article 5.X.7.;~~

~~5)~~ ~~any~~ *~~risk management~~* ~~measures should be the least restrictive measures required to mitigate the~~ *~~disease~~* ~~risks identified by a~~ *~~risk assessment,~~* ~~as described in Articles 5.X.8. to 5.X.11.;~~

~~6)~~ ~~measures should be taken to maintain the welfare of~~ *~~ornamental aquatic animals~~* ~~during transit, including as described in Article 5.X.12.~~

RATIONALE: In addition to the “General Comments” provided above, these edits address viable and appropriate options which should be used as general principles for the movement of ornamental aquatic animals. Additionally, for a market segment such as ornamental trade which is wrought with risks, point 5 above seems like an odd provision and should be removed.

Article 5.X.4.

Eligibility for the international movement of ornamental aquatic animals

Prior to considering the *aquatic animal* health *risks* associated with the import of a species of *ornamental aquatic animal*, the *Competent Authority* of an importing country should consult relevant national regulations and international obligations to determine that the species is eligible for import.

Species of *ornamental aquatic animal* may be subject to controls on international movement or trade due to their conservation status (e.g. listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)). These controls may prohibit international movement or may necessitate additional import documentation.

Species of *ornamental aquatic animals* (or taxonomic groups of species) may also be identified as invasive by a *Competent Authority* or other authority of an importing country. Such species may be prohibited to be traded, owned or farmed due to the risks they present to biodiversity, ecosystems, industry or public amenity in the *importing country*.

Article 5.X.5.

General health status of ornamental aquatic animals

*Aquaculture establishments* holding or packaging *ornamental aquatic animals* for international movement should have suitable facilities and husbandry practices for maintaining the health status of all species held within the facility.

The *Competent Authority* of an *exporting country* should ensure that *aquaculture establishments* are under sufficient supervision to ensure that requirements of the *Competent Authority* of the *importing country* for *ornamental aquatic animals* can be met. The *Aquatic Animal Health Services* relevant to meeting *importing country* requirements should comply with the principles of Chapter 3.1.

If *aquaculture establishments* are required by the *Competent* *Authority* to maintain a *biosecurity plan,* or if this is required to meet *importing country* requirements, the *biosecurity plan* should be developed ~~as described~~ considering the guidance in Chapter 4.1 ~~or following similar guidance~~.

*Ornamental aquatic animals* should not be moved or traded from an *aquaculture establishment* if they areexhibiting clinical signs of *disease* or experiencing unexplained mortalities.

**RATIONALE:** Edits afford member countries more flexibility.

Article 5.X.6.

Application of measures for listed diseases

*Sanitary measures* applied to manage the *risk* of transmission of *listed diseases* associated with movement of *ornamental aquatic animals* should be in accordance with the relevant disease-specific chapters. The *Competent Authority* of an *importing country* can only require disease-specific measures if it is free from the *disease* of concern, or if the *disease* of concern is under an official control programme, as described in Chapter 5.1.

When importing *ornamental aquatic animals* of *susceptible species* (as listed in Article X.X.2. of each disease-specific chapter), from a free establishment, *free country*, *free zone* or *free compartment*, the *Competent Authority* of the *importing country* should require, in accordance with Article X.X.9. of the relevant disease-specific chapter, that the consignment be accompanied by an *international aquatic animal health certificate* issued by the *Competent Authority* of the *exporting country* attesting that the consignment originates from a *free country*, *free zone* or *free compartment*.

The *Competent Authority* of an *importing country* can only require *sanitary measures* for a *listed disease* more stringent than the standards of the *Aquatic Code* if those measures are supported by a *risk analysis* in accordance with Chapter 2.1.

**RATIONALE:** Edits afford member countries more flexibility.

Article 5.X.7.

Risk Analysis

The *Competent Authority* of an *importing country* should use *~~risk analysis~~* ~~to justify any~~ *~~sanitary measures~~* ~~for non-listed diseases associated with imported~~ *~~ornamental aquatic animals~~*~~.~~ import r*~~R~~isk analysis* ~~should also be used~~ to justify any *sanitary measures* for *listed diseases* if the measures are more stringent than the standards of the Aquatic Code and consider guidance in Chapter 5.1. ~~The~~ *~~Competent Authority~~* ~~of an~~ *~~importing country~~* ~~can only require pathogen-specific~~ *~~sanitary measures~~* ~~if the country is free from the disease of concern, or if the disease of concern is under an official control program, as described in Chapter 5.1.~~

**RATIONALE:** Edits soften language and allow for more flexibility for the Competent Authority to address these concerns within their systems of governance.

*Risk analysis* for the import of *ornamental aquatic animals* should be conducted as described in Chapter 2.1. In addition to the factors provided in Chapter 2.1, the *risk analysis* should take into account the following factors relevant to the assessment of likelihood of entry and exposure of *hazards* associated with *ornamental aquatic animals*.

Entry

1) The disease status of identified hazards within the country, *zone* or *compartment* of origin, including information on the prevalence of identified *hazards* within populations of *ornamental aquatic animals* or within their source populations (e.g. wild animals).

2) The disease prevention and control practices within the supply chain for *ornamental aquatic animal*s in the *exporting country*, and the quality of the *aquatic animal health services* supporting disease prevention and control.

3) The range of species that are susceptibleto the specific *pathogenic agents* identified as *hazards* and the evidence to substantiate susceptibility in accordance with Chapter 1.5.

4) The suitability of environmental conditions (e.g. temperature, salinity) for the *hazard* at the place of origin of the *ornamental aquatic animals*.

5) The nature of supply chains and the degree of mixing or epidemiological separation of populations originating from sources with different health status.

Exposure

6) The presence of populations of *susceptible species* in the *importing country*.

7) The suitability of environmental conditions (e.g. temperature, salinity) for the *susceptible species* of imported *ornamental aquatic animals* in the *importing country*.

8) The suitability of environmental conditions (e.g. temperature, salinity) for the *hazard* in the *importing country.*

9) Intended end uses of the *ornamental aquatic animals* and the implications for exposure. For example:

a) display in zoos or public aquariums – *ornamental aquatic animals* may be displayed in professionally managed facilities which may have veterinary oversight and *biosecurity* measures in place;

b) exhibition or competition – *ornamental aquatic animals* may be moved internationally for short periods for participation in exhibitions or competitions, may be kept epidemiologically isolated, and then returned to the country of origin;

c) pets – *ornamental aquatic animals* may be moved internationally in large numbers and widely distributed through retail trade for sale as pets.

10) Cultural practices that may influence exposure, including diversion from intended end-uses (e.g. deliberate release into waterways, use as bait).

11) Internal measures for disease prevention and control and to limit diversion to non-intended end uses.

Article 5.X.8.

Risk management

The standards of the Aquatic Code are the preferred choice of sanitary measures for risk management of listed diseases associated with ornamental aquatic animals.

~~To develop sanitary measures for non-listed diseases, or to justify measures for listed diseases that are more stringent than the standards of the Aquatic Code, the Competent Authority of an importing country should follow the recommendations for risk management as described in Chapter 2.1. The sanitary measures should also comply with the requirements of Section 5 of the Aquatic Code.~~

**RATIONALE:** This text should be removed because it is out of place under the “risk management” section. Additionally, the edited guidance under “General principles” in Article 5.X.3. above now covers how to consider the risks of non-listed diseases.

Sanitary measures for imported ornamental aquatic animals can be applied along the import pathway. Options for risk management are provided in articles 5.X.9 to 5.X.11 and include those applied:

1)within the *exporting country,* as described in Article 5.X.9.;

2) at the *frontier post,* as described in Article 5.X.10.;

3) within the *importing country*, as described in Article 5.X.11.

Article 5.X.9.

Risk management measures in the exporting country

Where required by the *Competent Authority* of the *importing country* based on *risk analysis*, *risk management* measures can be applied within the *exporting country* to mitigate the *disease risks* associated with international movement of *ornamental aquatic animals* from a country, *zone* or *compartment* not declared free from *diseases* of concern. ~~The~~ *~~Competent Authority~~* ~~of the~~ *~~importing country~~* ~~should select the least restrictive measures required to mitigate the~~ *~~disease~~**~~risks~~* ~~identified by a~~ *~~risk assessment.~~*

**RATIONALE:** The term “least restrictive” is not measurable nor meaningful and this sentence should be removed.

*Risk management* measures may include:

1) registration or approval by a *Competent Authority* of *aquaculture establishments* that produce, hold or package *ornamental aquatic animals* for export. Registration or approval is a means for ensuring that any *aquaculture establishments* meet any necessary requirements for export of *ornamental aquatic animals* (e.g. general health requirements, *biosecurity*, record keeping);

2) confirmation that the exported *ornamental aquatic animals* are free from signs of *disease* or mortality at the place of origin (as described in point 2 of Article 5.X.7.) and meet general health requirements in accordance with Article X.X.5.;

3) pre-export *quarantine* in an *aquaculture establishment* (e.g. packaging facility) to ascertain the health status of the animals to be exported. The length of *quarantine* would be based on the *risk assessment* and may vary depending on the species and specific *diseases* of concern;

4) pre-export testing of consignments of *ornamental aquatic animals* to confirm they are free from *pathogenic agents* of concern;

5) systems for traceability and record keeping to ensure transparency of the health status of specific populations or consignments of *ornamental aquatic animals*;

6) appropriate packaging of *ornamental aquatic animals* to maintain their health status for the expected duration and conditions of the transport;

7) certification or provision of other documentation to verify that the *risk management* measures required by the *Competent Authority* of the *importing country* have been met.

Article 5.X.10.

Risk management measures at the border

Where required by the *Competent Authority* of the *importing country* based on *risk assessment*, *risk management* measures can be applied at the border to mitigate the *disease risks* associated with international movement of *ornamental aquatic animals* from a country, *zone* or *compartment* not declared free from *diseases* of concern. The *Competent Authority* of the *importing country* should select the least restrictive measures required to mitigate the *disease* *risks* identified by a *risk assessment.* *Risk management* measures may include:

1) upon arrival at the *frontier post,* the *Competent Authority* of the *importing country* may perform an inspection of the containers, checking that the consignment matches information included on the accompanying certificate or other documentation. The inspection may include checking for damage to the containers, and observing the animals for abnormal behaviour and suspected clinical signs;

2) at border *quarantine* under the supervision of the *Competent Authority*. The length of *quarantine* would be based on the *risk assessment* and may vary depending on the species and specific *diseases* of concern. Effluent and waste materials from the *quarantine* facilities ~~may be~~ should be treated or disposed of in a biosecure manner in accordance with Chapters 4.4. and 4.8.;

3) at border testing under the supervision of the *Competent Authority*. Any testing requirements would be based on the *risk assessment*;

4) As a last resort for imported animals that fail to pass post-entry risk assessment or arrive at the importing country with insufficient required documentation, destruction (as described in Chapter 7.4.) and biosecure disposal of clinically affected animals is recommended. All water (including ice), equipment, containers and packaging material used in transport may be treated or disposed of in a biosecure manner in accordance with Chapters 4.4., 4.8. and 5.5.

RATIONALE:

2) Edits for textual alignment with risk, because if quarantine is deemed necessary, then effluent should be handled accordingly.

4) Edits to clarify conditions for destruction.

Article 5.X.11.

Risk management measures in the importing country

The *Competent Authority* of the *importing country* may apply internal *risk management* measures, including to address the *risks* associated with *ornamental aquatic animals* being used for non-intended purposes or being released into the wild. *Risk management* measures may include:

1) prohibiting the diversion of *ornamental aquatic animals* for an alternative end use (e.g. for aquaculture, feed, bait, research) or from being released into the wild;

2) notifying the *Competent Authority* of the *exporting country* of the detection of a *pathogenic agent* of concern in a consignment, in accordance with Chapter 5.3.;

3) traceability of imported *ornamental aquatic animals* through the commercial supply chain.

Article 5.X.12.

Animal welfare during transport

Welfare of *ornamental aquatic animals* during international movement relies on the maintenance of environmental conditions appropriate to the biological characteristics of the species. The minimum requirements to maintain welfare will vary among different species.

Transport of *ornamental aquatic animals* in conditions that are not suited to their biological characteristics may increase vulnerability to infection and the development of clinical disease, leading to an increased likelihood of disease transmission.

Transport of *ornamental aquatic animals* should follow protocols that are appropriate for maintaining the welfare of the species being transported (e.g. for packaging, water quality, temperature, stocking density, duration). Where existing protocols are not available, they may be developed by considering the factors provided in Chapter 7.2. *Welfare of farmed fish during transport* and should accommodate other requirements during transport, e.g. the need for inspection and external container repackaging.

Contingency plans should be developed that identify possible adverse welfare events that may occur during transport, the procedures for managing each event, the actions to be taken and the responsibilities of the parties involved.

**RATIONALE:** Editemphasizes that any repackaging should be limited to the outer containers. In most cases aquatic animals are packaged in a manner that maintains water quality parameters by adding water treatments. Water quality in shipping bags is a delicate balance and water chemistry is often not well appreciated. Under very rare cases should the inner packaging be opened, and new water added because adding new water will disturb the water chemistry balance in the bag to the detriment of the animals and introduces new risks.

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