



February 29, 2008

NE Fish Health Committee Members

RE: Fish Health Management Guidelines

Dear NE Fish Health Committee Members:

The National Aquaculture Association (NAA) is a national trade association representing a diversity of aquatic animal producers in the United States. Aquaculture is one of the fastest growing agricultural industries in the US with over 4,000 farms producing a diversity of species such as catfish, trout, striped bass, tilapia, shellfish, aquatic plants, marine, ornamental and bait fish species. These species are produced for food, bait, to replenish diminished public fishery stocks, control of invasive aquatic plants and for the restoration of damaged wetlands. The NAA offers the following suggestions as you develop fish health guidelines for the NE Region.

The NAA Fish Health Committee has had opportunity to review your February 2008 version of Fish Importation Guidelines and the Resolution associated with the guidelines. Your resolution includes a recommendation that individual states within the NE Region institutionalize certain standards. We support your efforts to harmonize standards between states. Such harmonization helps eliminate regulatory conflicts and strengthens efforts to minimize spread of dangerous pathogens between states served by common watersheds. Our association is concerned about the spread of serious pathogens that could negatively impact our aquatic animal production.

As part of your harmonization efforts, we suggest it is first critical to thoroughly examine existing state import regulations and certification standards to determine if existent procedures have failed to protect your fishery resources. Domestically farmed fishes that are involved in interstate movement as live animals are already subject to extensive testing and certification requirements. The question to ask is whether these certification requirements have failed to protect state fishery resources. We suggest that if existent requirements have provided protection from interstate farmed fish movement, to add additional certification requirements cannot be justified from a fishery protection standpoint. The emergence of the Great Lakes strain of VHSV in wild fishes has highlighted a weakness in most state certification requirements- non-inspected feral fishes are frequently moved between watersheds and across state boundaries. We believe it is these movements that should be subject to critical certification efforts, not increasing an already protective certification burden on domestically farmed fishes.

111 W Washington Street Suite 1
Charles Town WV 25414
Tel: 304/728-2167 Fax: 304/728-2196
Email: naa@frontiernet.net Website: www.nationalaquaculture.org

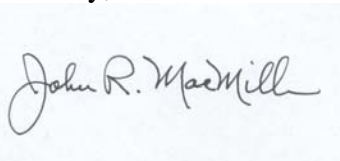
The NAA also suggests that state resources should be judiciously focused on pathogens that are proven threats to state fishery resources. Not all pathogens are significant threats and some pathogens likely in imported farmed fishes have been present for many years without causing harm or becoming established in your state fishery resources. Creating new standards that do not properly consider risk unnecessarily restrict fishery management efforts (intrastate and interstate movement) and create inspection burdens that impede safe interstate and intrastate commerce. Examples of pathogens that are significant threats are IHNV, VHSV and ISA.

The NAA recommends reconsideration of your NEFHC Guidelines to consider the following pathogen listing criteria:

- **Have existing NE region farmed fish health certification standards been effective in protecting state fishery resources from currently required or proposed fish pathogens?** We believe the answer is yes and suggest it is not justifiable to create additional certification standards for farmed domestic fishes involved in interstate movement.
- **Is the pathogen already present in state fishery resources? If so, is there a state-wide effort to eradicate the pathogen? If not, are there ecological reasons the pathogen is not likely to become established?** We believe farmed fishes imported into the NE region have not introduced any pathogens. The reasons for this are likely the effectiveness of existing certifications.
- **Is the pathogen likely to adversely impact state fishery resources? Is the pathogen already a significant cause of wild fish mortality in other states?** We suggest the Great Lakes strain of VHSV is the only emerging pathogen deserving of greater scrutiny. Scrutiny already exists on domestic farmed species so focus should be made on feral fishes.
- **Are there well established diagnostic protocols for a pathogen?** Refer to the AFS Blue Book or OIE protocols for guidance.
- **Is the pathogen a public health concern?**

The NAA encourages the harmonization of regulatory criteria for the interstate movement of live fishes. Such harmonization will enhance ease of fishery management, enhance public confidence that resources are being protected and reduce confusion among those involved in interstate commerce. We encourage science-based, risk analyses in the construct of fish pathogen import regulations.

Sincerely,



John R. MacMillan, Ph.D.
President

JRM:ml