



January 8, 2008

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Via Email: Peter.Merrill@aphis.usda.gov

RE: NAA Comments on OIE Aquatic Animal Health Documents

Dear Dr. Merrill:

The National Aquaculture Association (NAA) appreciates the opportunity to provide comment to the USDA on several draft OIE Aquatic Animal Health Documents. The NAA is the largest farmed fish trade association in the United States. The NAA represents producers of farmed finfish and shellfish. The producers we represent husband a variety of cold, cool and warm water species farmed in fresh and salt waters of the United States. Farmed species raised are produced for human food consumption, recreation, bait and for ornamental purposes. Our comments are organized by draft chapter and reflect the order we reviewed them. Any chapters not specifically identified in this letter indicate no comment.

Handling and Disposal of Carcasses and Wastes of Aquatic Animals

The chapter was thorough and provides effective guidance on how to deal with carcasses and offal from processing. We suggest the chapter include guidance on how to effectively deal with biosolids or manure in order to minimize the potential of fish pathogen spread. If the authors did not intend to include manure perhaps reference to waste should be changed to "offal" or diseased fish parts.

Gyrodactylosis

This chapter is thorough and provides effective guidance. However, the authors suggest disease free status can only be demonstrated after 25 years of no parasite detection in susceptible species. The time for disease free determination is excessively long compared to other diseases of aquatic animals. For example only two years of no

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detection is needed to declare an area free from *Batrachochytrium dendrobatidis* or *Ranavirus*. Are the pathogens so different that their disease free status could warrant such divergent time differences?

Introduction to OIE Guidelines for the Welfare of Live Aquatic Animals

The new introduction to aquatic animal welfare is not much different from the previous draft introduction and we strongly oppose its approach. We suggest aquatic animal welfare guidelines focus on ways to ensure good husbandry conditions for aquatic animals. Measures of good husbandry are subject to scientific analysis and avoid anthropomorphic assumptions. Suggestions that the “internationally recognized five freedoms” should provide valuable guidance are disingenuous and inconsistent with current scientific understanding about poikilothermic animal sentience and pain perception. Contrary to statements in the OIE Animal Welfare Committee Sept 2007 meeting minutes, the science supporting poikilothermic animal sentience and perception of pain is very weak and remains extremely controversial. Consequently, to suggest there is an “ethical” responsibility to ensure welfare or that the OIE members should consider “value based assumptions” is premature. Such statements are an essentially political commentary and an unnecessary diversion to efforts to accomplish what we presume to be the goal of OIE, to foster good aquatic animal welfare.

It would be helpful for all stakeholders if an acceptable definition of aquatic animal welfare was first developed. The OIE Animal Welfare Committee is currently considering proposed language for the terrestrial animal code- “Animal Welfare means the state of an animal as regards its attempt to cope with its environment and includes both the extent of failure to cope and the ease or difficulty of coping.” We suggest the definition of aquatic animal welfare will not have the same emphases that human welfare or homeothermic animal welfare should have. The scientific reasons are that poikilothermic animals are far less sentient, if at all, than homeothermic animals and their ability to perceive pain is very uncertain. Consideration of such a definition for aquatic animal welfare might enhance progress on developing appropriate guidelines for aquatic animals.

Aquatic animal welfare can be appropriately addressed by focusing on key objective measures of farmed animal success. These measures include feed conversion, mortality and morbidity and growth rate. Generally, farmed aquatic animal populations that convert feed efficiently and have low morbidity and mortality can be assumed to be experiencing good animal welfare. We believe there is considerable scientific evidence supporting this assumption and that all stakeholders could support guidelines based on these measures of success.

We suggest the introduction be significantly revised. That revision should additionally include a statement that the use of aquatic animals in aquaculture, harvest or capture fisheries, research and recreation (e.g. ornamentals, aquaria and sport fishing) makes a major contribution to the wellbeing of people.

Guidelines for Aquatic Animal Health Surveillance

We found the guidelines well written and thorough. We particularly value the recognition in the guidelines that there is need to prioritize efforts. The guidelines here need to be reconciled for consistency with the guideline proposed for Gyrodactylosis, *Ranavirus* and *Batrachochytrium* disease-free status determinations. The surveillance guidance suggests 10 years should be required for disease free status attainment.

Diseases listed by the OIE

The NAA continues to support the inclusion of OMV on the list of notifiable diseases.

Recommendations for Transport

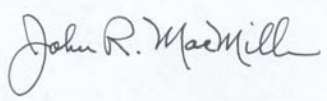
Most of the recommendations are sound. However, reference to welfare should be removed until there is acceptance of a definition of aquatic animal welfare. We suggest the definition of aquatic animal welfare will not have the same emphases that human welfare or homeothermic animal welfare should have. The scientific reasons are that poikilothermic animals are far less sentient, if at all, than homeothermic animals and their ability to perceive pain is very uncertain.

Draft Guidelines for the Control of Aquatic Animal Health Hazards in Aquatic Animal Feeds

We suggest the definition of “meal” should include other animal and plant meals besides just aquatic animals. Common reference within the aquaculture industry is to fish, poultry by-product, blood, and soybean meal. No justification is evident to limit reference to meal as just fish meal. Additionally, in Item 4, General Principles (e), the last sentence should refer to aquatic “animal” protein rather than aquatic protein.

The NAA greatly appreciates the opportunity to provide comment. We would appreciate knowing the final comments to the OIE from the USDA.

Sincerely,



John R. MacMillan, Ph.D.
President

cc: Dr. Michael David