20th June 2022

Biosecurity regulations – Petuna Submission

Reference to: Consultation period on new aquaculture standards

To whom it may concern,

This submission is in reference to the proposed Biosecurity Regulations for Salmonid Aquaculture and specifically, Annexure 2 "Biosecurity Program: Tasmanian Salmonid Industry – Draft 1.2" and "Regulatory Impact Statement- DRAFT Biosecurity (Salmonid Biosecurity Zones) Regulations 2022".

Petuna Aquaculture has identified several issues with the regulation, as operational difficulties with relatively low biosecurity risk. We have outlined these, with recommendations below, for Biosecurity Tasmania's (BT) consideration before finalising the Biosecurity Program.

Petuna Aquaculture would like to recognise first, that this program has been an iterative and collaborative process with BT, which has been in development for many years. The implementation of this program has significant industry support and is necessary to safeguard our industry from biosecurity threats.

As part of this collaborative process, the following recommendations are suggested for consideration by BT. Our industry position (through the Joint Salmonid Industry Health Group) is submitted separately by the Tasmanian Salmon Growers Association (TSGA). **This letter is to inform BT of Petuna specific concerns and contains commercial-in-confidence information.**

To start, a general comment that we would like to make regarding the standard, is exceptions or exemptions to the standard inconsistently being written into the standard; and in some cases requiring a letter from the secretary. We request that any exemptions are written into the standard, and agreed between industry and BT; or that if exemptions are required to be approved individually by the secretary, then there is a period of time associated with the approval of 10 years (in accordance with the Salmon 10-year plan).

[redacted]

MOS 14. Detection of biosecurity events

"To promote compliance with section 73 of the Act, a salmonid producer must ensure that any suspected or known incidents of the following nature are treated as a suspected biosecurity event:

(a) any incidence of fish mortalities, that are unrelated to predation, misadventure or other similar event, affecting greater than 0.25% of fish per day for three consecutive days in an individual pen, or affecting more than 0.5% of fish in a single day in an individual pen; and
(b) any incidence of any known or unknown disease affecting greater than 0.25% of fish per day for three consecutive days in an individual pen, or affecting more than 0.5% of fish in a single day in an individual pen; and
(c) any discovery during marine farming or other operations of any notifiable or suspected invasive marine pests, such as any unusual, uncharacteristic or unidentified marine flora or fauna species; and
(d) any type of incident, event or observation specified by the Joint Salmonid Industry Health Group for the purposes of this standard; and
(e) any other incident, event or observation that, in the reasonable opinion of the salmonid producer, indicates that a biosecurity event has occurred or is likely to occur."

Recommendation:

Remove 14 (b) due to the reporting burden. 14 (a), (c), (d) and (e) cover all biosecurity risks associated with the detection of mortalities. 14 (b) is therefore a redundant statement, and implies that we are to report all endemic diseases as well. The word "affecting" could be interpreted as mortalities OR that 0.25% of the population is affected by the disease. Although this may appear purely a grammatical issue, there are production and operational implications to this standard, including the inability to effectively determine - without excessive lethal sampling on the population - if 0.25% of the population is affected.

MOS 18. Fish Movement records

"…(b) a description of each consignment of fish being moved;"

Recommendation:
Further definition of what is required in a description is needed, as 18 (c) covers unique identification codes, fish numbers, year class and average weight.

MOS 18. Fish Movement records

"…(f) if fish are brought into a salmonid biosecurity zone from a freshwater facility, a copy of –
(i) the relevant Inland Fisheries Service Transport Approval; and
(ii) all biosecurity certificates issued in respect of the fish."

Recommendation:
As opposed to: "relevant Inland Fisheries Service Transport Approval" – we would like to see the actual name of the approval letter. From an auditing perspective, they will request specific documentation if it is listed. If not, simply change to "relevant approvals".

[redacted]

MOS 8. And FOS 7. Salmonid industry biosecurity certification scheme

(1) "All salmonid producers must participate in an industry-wide salmonid biosecurity certification scheme that is approved by the Chief Veterinary Officer."

Recommendation:
Clarification is needed on the operation of the "scheme" – we note that in previous meetings BT has welcomed the JSIHG participation and we would appreciate similar collaboration with the scheme operational manual (or similar). A "scheme" insinuates that there will be governance and quality control over the auditing process against this biosecurity regulation. Our recommendation is to have a third party develop the operational manual with BT and industry to ensure that the right levels of governance are included; and if there are any disputes these can be handled in a manner that has minimal impact on business.

FOS 23. Notification, testing and other requirements relating to therapeutants

"A salmonid producer engaging in the use of therapeutants must ensure that –
(a) prior to the use of a therapeutant, the Chief Veterinary Officer is notified of the proposed use, and provided with a copy of any medication authority specific to the stock treatment that has been issued; and
(b) all stock receiving medicated feed is recorded to ensure the correct withholding period (if any) is met; and
(c) all feed equipment used to deliver and distribute medicated feed is appropriately treated after use to manage any risk of residual therapeutant entering any other than treated animals; and
(d) any requirements to undertake residue testing specified in any relevant legislative requirement or instrument issued by a Commonwealth, State or Local Government authority are complied with."

Recommendation:
To define "therapeutants" or to be specific about "antibiotic use". As drafted, immersion baths for ectoparasites could be considered "therapeutants". However, if the intention is for antibiotic use (only) to be notifiable, then this should be clear. Otherwise, treatments such as peroxide, formalin and chloramine T would also fall under this banner. Our preference is to treat all our inland farms as private, so it is more appropriate for BT to write in guidelines on antibiotic treatment procedures, rather than a notification process seeing as this is not expected with any other private farming enterprise. We can appreciate that there is a requirement to notify if antibiotic treatments are being used in public waterways, and therefore support notification to the Chief Veterinary Officer prior to treatment in all ***marine*** *leases.*

FOS 27. Certification of fish from freshwater facility to marine farm

"(1) A salmonid producer must ensure that no live fish or group of live fish from a freshwater facility is moved to a marine salmonid biosecurity zone unless a veterinary biosecurity certifier has issued a biosecurity certificate in respect of the fish, which certifies the following matters:
(a) the vaccination of the fish in accordance with a vaccination program endorsed by the Joint Salmonid Industry Health Group and approved by the Chief Veterinary Officer; and
(b) the fish being from a tank or pond of fish that has passed, not more than 28 days prior to the day of movement, a health assessment process involving –
(iv) a gross external inspection by a person competent in fish health; and
(v) appropriate sampling for necropsy and laboratory testing of each tank or pond of fish to be transported; and
(vi) consideration of the disease status of all populations in the respective facilities; and
(c) the fish being sufficiently seawater adapted for entry into the zone.
(2) A salmonid producer must keep a record of all health assessments carried out, and certificates issued, under subclause (1)."

Recommendation:
To re-word to ensure a clear reference to a "population", rather than single production units. This clause currently stipulates that all tanks or ponds need to be checked. However, we would conduct our checks with selected tanks or ponds, if multiple were going to be transported, to bias the sampling to moribund fish.

FOS 29. Decontamination of live fish transport vehicles

"A salmonid producer must ensure that live fish transport vehicles under the control or management of the producer undergo an effective treatment measure after each individual trip involving the transport of fish to prevent, eliminate or minimise so far as is reasonably practicable any biosecurity risk that may be posed by the vehicle before its next use."

Recommendation:
Currently, there is no acclimation required for Rowella, and therefore no water is exchanged in this process. In this process, there is minimal biosecurity risk because no saltwater is exchanged, and there is no contact with marine fish or pens. This comment also applies to MOS41.

We recommend to change this wording to: "Live transport vehicles undergo effective treatment to ensure biosecurity risk related to movements from the freshwater to marine, or freshwater to freshwater environments are managed."

The ongoing cost of this regulation is significant for Petuna Aquaculture. We have identified that an additional employee is required, as well as training which equates to c. $100,000 in the first year alone (including the required training courses for lead internal auditing). We would like these contributions to be recognised by BT, and currently the ongoing costs are not included or considered in the regulatory impact statement.

The regulatory impact statement also over-inflates the impact of the new regulations and does not consider the current activities supported by the salmon industry, that also have a significant impact on state biosecurity including: vaccine development (ongoing R&D cost and commitment to active participation in governance and technical input); passive surveillance program; and original co-funding of the infrastructure to support the biosecure fish facility.

We appreciate the significant work that has gone into these Biosecurity Standards. For several years, Petuna Aquaculture has actively participated in the development of this industry standard, and we are supportive of the process and future improvements in the industry.

Regards,

Christine Huynh
Fish Health Manager
Petuna Aquaculture