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January 3, 2012

Dr. P. Gary Egrie
Farm Animal Welfare Coordinator
USDA, APHIS, Veterinary Services
4700 River Road, Unit 46
Riverdale, MD 20737
E-mail: Paul.G.Egrie@aphis.usda.gov

VIA E-MAIL ONLY

Dear Dr. Egrie:

The AVMA appreciates the opportunity to provide comments on the following thirteen (13) documents extracted from the report of the October 2011 meeting of the OIE Aquatic Animal Health Standards Commission (AAHSC). As requested, when we have comments on revised or proposed text, our responses are formulated for this Chapter as follows:

- a. identification of the text, as written in the AASHC report, on which we are commenting;
- b. description of the changes we believe should be made to the text, to include suggested language, if any, to implement those changes; and
- c. scientific justification or rationale for such changes; or comments if no specific changes are suggested.

When language revisions are suggested under “b.,” we assumed that any changes proposed by the AASHC have been accepted. Thus, our recommended deletions are indicated as ~~struck through~~ text and additions as underlined text.

SECTION 1—CURRENT CHAPTERS WITH CHANGES RECOMMENDED BY THE CODE COMMISSION (COMMENTS ALLOWED ONLY ON OIE CHANGES INDICATED)

1. Glossary

The AVMA agrees with the proposed changes.

2. Criteria for Listing Aquatic Animal Diseases

The AVMA agrees with the proposed changes.

3. Assessment for listing of Infection with Ostreid Herpesvirus-1 (including OsHV-1 μ var) as an emerging disease

The AVMA offers no comments.

4. Diseases Listed by the OIE

The AVMA agrees with the proposed changes.

5. Import Risk Analysis

The AVMA agrees with the proposed changes.

6. Welfare of Farmed Fish During Transport

The AVMA agrees with the proposed changes.

7. Welfare Aspects of Stunning and Killing of Farmed Fish for Human Consumption

a. TEXT: *Article 7.3.8, paragraph 2:*

Examples of stunning/killing methods for fish groups

2. spiking or coring: ~~salmonids~~, tuna;

b. CHANGES & REVISIONS SUGGESTED: The AVMA recommends retaining salmonids such that the above language remains unchanged and reads as “spiking or coring: salmonids, tuna;”

c. RATIONALE: Unless there is good justification for deleting salmonids, the AVMA believes spiking or coring are appropriate methods to humanely kill farmed salmonids for human consumption.

8. Killing of Farmed Fish for Disease Control Purposes

The AVMA agrees with the proposed changes.

9. Disinfection of Salmonid Eggs

The AVMA agrees with the proposed changes.

10. Infectious Salmon Anemia

The AVMA offers no comments.

SECTION 2—NEW CHAPTERS (COMMENTS ALLOWED ON ALL TEXT)

11. Communication

The AVMA agrees with the proposed wording of this new chapter.

12. Monitoring of the Quantities and Usage Patterns of Antimicrobials Used in Aquatic Animals

The AVMA agrees both with the intent, which is to provide “the direction in which countries should develop with regard to collecting data and information on the use of antimicrobial agents in aquatic animals,” and the proposed wording of this new chapter.

13. Development and Harmonization of National Antimicrobial Resistance Surveillance and Monitoring Programmes for Aquatic Animals

The AVMA agrees with the proposed wording of this new chapter.

As always, we appreciate the opportunity to provide input. Should you have questions or require additional information about our comments, please do not hesitate to contact Dr. Beth Sabin, International Coordinator and Assistant Director in our Education and Research Division (esabin@avma.org; 800-248-2862, ext 6675).

Sincerely,



W. Ron DeHaven, DVM, MBA
Executive Vice President and CEO