

Wisconsin Aquaculture Association

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P. Gary Egrie, VMD
Veterinary Medical Officer, Aquaculture Specialist
United States Department of Agriculture
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1/5/2007

Dear Gary;

The Wisconsin Aquaculture Industry Advisory Council (WAIAC) and the Wisconsin Aquaculture Association (WAA) joint committee on Fish Health has put together suggestions, comments and items of concern regarding the proposed APHIS interim rule for VHS. Wisconsin is very concerned about the possible spreading of VHS into waters not now infected, monitoring of affected waters and rules that will help contain the disease without placing undue economic hardship on the aquaculture industry. Wisconsin has in place a model fish health program administered by the Department of Agriculture, Trade and Consumer Protection Animal Health Division (DATCP) which assesses fish health risks and insures accountability. The Committee feels strongly that the entire U. S. should be testing for VHS because of shared and connected watersheds, and because states unaffected by the Federal Order are being used to launder fish and documents, avoiding the scrutiny of testing; this loophole would be closed with all states coming under the testing requirements.

The committee has developed 19 suggestions and points of concern for your consideration. WAIAC has been a strong supportive council for Wisconsin Aquaculture- the following is their Mission:

The Wisconsin Aquaculture Industry Advisory Council (WAIAC) mission is to actively build partnerships to enhance the responsible development of agriculture for the benefit of private and public fisheries. It does so by serving:

- a. as a forum for the aquaculture industry to work with state and federal agencies and university staff to identify critical issues affecting it's ability to grow in an economically and environmentally sound manner.
- b. to make recommendations to agency leaders, policy makers, and research/educators for policy and regulatory changes, research projects, business and marketing initiatives, and educational programs that address the critical issues facing the industry.

c. to facilitate coordination and build partnerships among public agencies, private organizations, producers, the scientific community and educators in order to build a stronger, more profitable aquaculture industry.

Fish Health Committee:

Dave Gollon, Jr.	Gollon Fish & Bait Farm
Bill West	Blue Iris Fish Farm
Dan Gruendemann	Northside Enterprises
Mike Heilman	Brookcrest Fisheries
Dr. Myron Kebus	DATCP
Ron Johnson	Northern Aquaculture Demonstration Facility UW-Extension

Additional support:

“The Northern Aquaculture Demonstration Facility (NADF), a UW-Stevens Point facility, has reviewed the suggestions and concurs they seem very appropriate and logical, so therefore, fully endorses the committee recommendations”- Co-Directors Chris Hartleb and Jeffery A. Malison.

“The University of Wisconsin-Madison Aquaculture Program reviewed the Fish Health Committee VHS suggestions and endorses their recommendations” – Jeffery A. Malison Director.

We hope these suggestions will help you in the development of the VHS Interim Rule, which will slow the spread of VHS, while allowing aquaculture business to continue with the minimum economic impact. If you have questions regarding these suggestions please contact me.

Sincerely;

Dave Gollon, Jr.
Fish Health Committee Chairman
Chairman of the Board WAA

VHS Interim Rule Suggestions:

1. VHS susceptible fish species have moved and continue to move widely throughout the U.S. Therefore all 50 states (and Canada) must be required to test all susceptible species initially so we can understand the distribution of VHS. It would be unsatisfactory for only the 8 Great Lakes states to continue testing while other states are not required to test; this would allow too many loop holes and opportunities to skirt the law.
2. The economic hardship placed upon farmers for VHS testing will be unbearable, unless farmers have the option to test lots (Bluebook, ~ 60 fish) or test farms (OEI certification, ~ 150 fish twice per year of mixed species). Allowing these options will greatly increase farmer compliance and support for the interim rule. The interim rule should require states to accept either testing method.
3. To ensure continuity and uniformity, all testing methods and protocols must be standardized including a standard VHS certification form. APHIS should monitor states to make sure that these standards are properly followed and compliance is uniform throughout the U.S.
4. Only the known susceptible species are required to be tested at this time. However, as new susceptible species are verified, a seamless method of adding these must be accomplished without interference in interstate transportation.
5. Broodfish pose little threat if these fish do not leave the farm and testing of brood fish is very expensive and in some cases prohibitive because of the small number (i.e. 10-15 or fewer). Therefore, the interim rule should allow for testing of offspring in place of broodfish testing.
6. As this is a federal disease control program, the interim rule should require that all testing, for purposes of movement of fish, be conducted by accredited veterinarians and monitored by APHIS (Veterinary Service). We feel there is a conflict of interests by allowing resource agencies to internally test the fish they raise on their fish hatcheries. We feel that these hatcheries should be required to use third party testing, accredited veterinarians, just like private fish farms. States that do not have adequately trained veterinarians or a health program in place should be encouraged to establish them.
7. The Federal Order has placed an enormous strain on our competent state fish health authority. We feel that federal money sent to states to help support the interim rule should be provided to the competent state fish health authority.
8. While VHS has been a disease of wild fish, so far the fish farmers have been required to carry a disproportionately greater share of the economic burden of the federal order. While we recognize that wild fish surveillance may be an important component of the interim rule it should not be funded at the expense of not providing funds to farmers to pay for required testing in the interim rule.
9. In order to ease the financial burden and encourage more testing, federal money should be provided to fish farmers to offset the costs for conducting required VHS testing in the interim rule.
10. Education must be a component of the requirements to lessen the spread of VHS. Education of the boating public and fishing tournaments, along with business stakeholders, will go a long way towards inadvertent transmission of the virus. The boating public has a poor track record with invasive species and will need to be informed about the seriousness of this disease.
11. Natural resource agencies move many VHS susceptible species of fish within their states from one public body of water to others to meet stocking goals. These movements should be required to be VHS tested under the interim rule.
12. Federal money should be provided to research spreading VHS via alternative risks including looking at avian and crayfish transmission, and water from recreational vehicles. Research

should also assess the risks of VHS surviving in mud and what sterilization or sanitation methods are most appropriate.

13. There are transportation agents that are neither fish farmers nor wild bait harvesters. The interim rule should include them; the rule should develop best management practices for custom haulers, brokers, and all parties involved in transportation of fish.
14. Because this virulent form of VHS is new and not fully understood, a program should be developed to monitor short and long term effects of already infected water bodies.
15. There should be a federal indemnification program providing funds to farms if they become infected; without this in place, abnormal mortalities may not be duly reported thereby creating higher risks of spreading the disease.
16. There should be a national data base which is easily obtainable, listing water bodies infected with reportable diseases. Also, individual states should be encouraged to develop their own publicly viewed data base as each state has its own regulations.
17. Health programs are extremely important; therefore states which prohibit imports on economic grounds should not be eligible for federal assistance under this program. If a state closes its borders to imported fish, then they should not receive funds from APHIS for its testing program that will allow them to export fish. It would not be fair to provide the same level of assistance to states that have interstate trade barriers as would be provided to states that do not have those same trade barriers (as long as they meet health requirements).
18. There will be a burden on fish farmers if testing for the VHS virus is restricted to only cool water temperature times of the year. Testing during any time of the year, that does not put undue stress on the fish, should be allowed.
19. There should be no exemptions given to fishing tournaments in regards to transportation of fish from one locality to another. In this regard Multi-state fishing tournaments should be required to register, not only with the state, but with APHIS as well.