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INC.



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OF
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10th November 2015

Ref: State-wide review of pest animal management.
Control of non-native Carp species in NSW waterways with release of KHV

Dear Sirs,

On Behalf of the Koi Society of Australia (KSA), The Koi Association of Australia (AKA) and the Koi Society of Western Australia (KSWA) I would like to formally lodge our concerns over one section of the NSW State-wide review of pest animal management. Namely the intended release of Koi Herpes Virus (KHV). Please see attached list of Questions and Concerns.

Recently, senior members of the KSA met with Mr Matt Barwick (DPI NSW) and Mr Ewan Colquhoun (Ridge Partners, Qld) to discuss the KHV release project. We were interested to know more about the potential implications to the Koi keeping hobby within Australia as well as the environmental impact generally. I personally also attended a meeting in Sydney with delegates from NSW Government, Fisheries and Angling/Fishing committees.

The KSA, AKA and KSWA exists not only for their members (approximately 2000 members in NSW & WA) but the Koi Hobbyists throughout NSW and WA (tens of thousands). We are accredited branches of the Zen Nippon Airinkai (ZNA) in Japan which act as the World-wide governing body of Koi keeping. As such, we are in regular contact regarding the efforts of many Countries to control KHV, and devastating effects of this Virus.

At this point in time, we believe that insufficient evidence exists to allow KHV to be released without fear of significant impact to our environment, financial and emotional loss to the public and huge damage to Australia's International standing as an environmentally conscious nation.

Recently I became aware of a Company called K&C Fisheries (www.kcfisheries.com.au). As their corporate message indicates, they "Innovatively Transform a Pest to a Resource". This award winning company ship Australian Carp Fillets, Roe and Skins around the world. Carp is one of the highest consumed fish overseas, with consumption per annum in China of 1.23million tons, Poland 80,000 tons and Israel 40,000 tons. NSW and Australia would be well advised to look at Carp as a resource rather than a pest that is financially and environmentally costly to eradicate.

I would urge you to reconsider the option to release KHV and investigate alternative measures for carp control. Myself and members of KSA, AKA and KSWA are of course available for discussion and meetings with NSW Natural Resources Commission to answer any questions you may have.

Yours sincerely

Gerard McDonald
KSA President

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Ian Andrews - Australian Koi Association AKA
Shona MacsKasy - Koi Society of Western Australia KSWA

I would like to address our concerns under three headings:

- The immediate impact of KHV release within Australian/NSW Waterways.
- Possible alternatives to KHV release.
- NSW Natural Resources Commission's process itself

The immediate impact of KHV release within Australian/NSW Waterways.	
1. Estimates show that European & Asian Carp represent approximately 80% of the Biomass in many Australian Lakes & Rivers. The clean-up operation to remove dead and dying fish carcasses will be complex and very expensive.	<ul style="list-style-type: none"> • KSA does not believe that this stage of the KHV release process has been explored thoroughly. • Financial estimates and man power planning for this element of the KHV release project appear to be inadequate and anecdotal at this stage. • The clean-up is likely to be 'ongoing' since KHV and its effects on Carp species are likely to persist, especially if the KHV release is repeated. • The figures from NSW Fisheries and DPI of \$30 million for this Clean-up are likely to be significantly under estimated.
2. Once released, KHV will not be 'controllable'.	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly. • Whilst KHV is recognised as a DNA virus and as such is more stable than RNA Viruses, mutations do occur. • Since guarantees cannot be given that the KHV will not mutate. Deeming it impossible to gauge the risk of such mutations in the long run to native fauna. The public would not want it see something like the Tasmanian devil facial tumours occurring to platypus as an example (or something similar)
3. In order to maintain "potency" of the KHV, it is highly likely that additional releases of the Virus will be required.	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly.
4. No studies exist that investigate the long term effect of KHV in waterways and the cumulative effects of Viral Loading (see section 4).	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly.
5. KHV will undoubtedly transfer from areas of targeted release to un-targeted areas	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly. • This unplanned transmission of KHV will involve not only biological vectors such as Birds and Amphibians but intentional cross contamination by humans removing carcasses of dead Carp and relocating to other waterways. This was seen with the initial releases of Calisivirus, where Rabbit carcasses were moved from one area to another.
6. The Koi hobby and Koi Industry will be affected since Koi will be exposed to KHV for the reasons mentioned above	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly. • At this stage, the emotional, financial and logistical implications have not be thoroughly assed by the authorities involved with the intended KHV release.

7. <u>Immunisation of Koi against KHV is most certainly NOT an option.</u>	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly. • Unlike inoculating a Rabbit against Calisivirus, Koi cannot be protected in this way. • The inoculations against KHV are very much experimental, often ineffective and very expensive. • Many Koi hobbyists and Koi Breeders have thousands of Koi in their collections. • Logistically, Koi could not be individually injected.
8. KHV kills Carp in a slow and often disturbing way (Gills rot, and the fish may take days to suffocate).	<ul style="list-style-type: none"> • KSA does not believe that this part of the KHV release process has been explored thoroughly. • The impact on the general public of potentially witnessing tonnes of Carp gasping at the surface has not been adequately considered.
9. Timescale for release of KHV.	<ul style="list-style-type: none"> • There has been little consultation, nor research into the Australian Koi hobby or industry, to assess the cost and education to implement KHV identification (e.g. PCR testing), best practice bio security and environmentally responsible clean-up of affected ponds.
10. Level of research on effect of KHV on Koi.	<ul style="list-style-type: none"> • There has been no research into the effect of the KHV on Australian Koi. • While it is recognised that carp and koi are the same species, koi are an isolated variant. • Whilst the effect of KHV on koi overseas is known, our population has been isolated for at least 40 years and therefore susceptibility needs to be established

Possible alternatives to KHV release.	
1. Daughterless Carp Project	<ul style="list-style-type: none"> • KSA does not believe that this alternative to KHV release has not been investigated. • The idea of Daughterless carp is very safe • No OIE listed disease release • It protects the Koi hobby. • Less environmental impact from Dead or dying Carp in Waterways
2. The potential commercial gain of catching and processing Carp caught in Australian Waterways	<ul style="list-style-type: none"> • KSA does not believe that this alternative to KHV release has not been investigated. • Carp as a food source is common outside of Australia. • Carp or fish meal or fertiliser is common outside of Australia.
3. The potential environmental advantages of catching and processing Carp caught in Australian Waterways	<ul style="list-style-type: none"> • KSA does not believe that this alternative to KHV release has not been investigated. • Carp as a food source is common outside of Australia. • Carp or fish meal or fertiliser is common outside of Australia
4. The potential political gain of catching and processing Carp caught in Australian Waterways	<ul style="list-style-type: none"> • KSA does not believe that this alternative to KHV release has not been investigated. • Carp as a food source is common outside of Australia. • Carp or fish meal or fertiliser is common outside of Australia

NSW Natural Resources Commission's process itself	
1.	As a process the very limited release of information to the public and affected stakeholders has not permitted a truly informed decision making process.
2.	The limited time and resources applied by the Commission to meaningful consultation with the public and key stakeholders' will not assist the Commission in making an informed decision with regard to community concerns. This process is not robust and may lead to legal challenge and a greater erosion in Government reputation with regards to the control of vertebrate pests through the use of biological control programs.
3.	The Commission has little understanding as to the Socio economic impact of the decision to release KHV this is a critical aspect of an informed decision making process
4.	The Commission's view to releasing KHV which does not respect State borders is prejudicial to other States and is placing at risk Australia's "Clean Green" status with regard to the potential export earnings market of Carp and Koi fish sales overseas.
5.	The Commission's review of pest animal management should be an informed overarching strategy and as such Government Agencies' will be directed by this document to spend taxpayer funds on the development of control programs. Therefore by naming the release of KHV as a method of controlling Carp in this ill-informed manner the Commission is introducing a prejudice that currently does not exist.

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