

Import of live sturgeon for aquaculture - Issues Paper			
Reference	Context	Comments	Recommendation
1.4.2 (Scope)	<i>"This is because it does not exclude the scenario where the imported sturgeon may be cultured with other species of finfish in the same recirculating aquaculture facility, which can then be translocated to less secure semi-open systems depending on the aquaculture license conditions."</i>	Licence conditions on co-cultured fish should prohibit release to less secure systems.	PIRSA recommend undertaking the BIRA under two scenarios of importation: 1. Into a secure RAS system 2. Co-culture RAS system, with the co-cultured species translocated to a less secure system.
Hazard identification and refinement (Table)	<i>Infection with betanodovirus (Viral encephalopathy and retinopathy [VER]) was retained for risk assessment in the draft issues paper that PIRSA reviewed.</i>	<ul style="list-style-type: none"> • This pathogen is present and included on the Australian List of reportable diseases of aquatic animals and domestic control measures are in place. • Evidence of susceptibility in sturgeon and can cause significant mortalities in susceptible species. • VER was not retained in the risk assessment in the current issues paper. • The <i>Livestock Act 1997</i> has legislated requirements to report notifiable conditions and 	PIRSA recommend that VER be retained in the current Department's BIRA to import live sturgeon for aquaculture purposes.

		<p>restricts movement of livestock affected with notifiable condition. These requirements are for purposes of controlling, containing and eradicating disease.</p> <ul style="list-style-type: none"> • There are also specific requirements for the management of VER in the South Australian Translocation Protocol for Aquaculture Stock, which is referenced in the <i>Prohibition of Entry into and Movement within South Australia of Aquaculture Stock Notice 2020</i> pursuant to the <i>Livestock Act 1997</i>. 	
1.4.3 (Existing policy – Page 5)	<i>“Licensed aquaculturists must also have approved disease control programs and must report significant disease events.”</i>	In South Australia, licence holders under the <i>Aquaculture Act 2001</i> may not have a particular disease control program but rather have conditions imposed on the licence restricting the activity to manage potential risks (i.e. limitation on species and farming methods permitted for aquaculture). This depends on the nature of the activity proposed under an aquaculture licence/ licence application, which is assessed on a case-by-case basis.	It is recommended these options for risk management are considered in the BIRA given licence-level disease control programs may not be present in some instances.

Summary	<p><i>“The hazard identification in this Issues Paper considered 65 disease agents, including viruses, bacteria, fungi/oomycete and protozoan parasites as potential hazards. Of the 65 disease agents, 11 are proposed as hazards that will be retained for risk assessment.”</i></p>	<ul style="list-style-type: none"> • There are two broad risk areas with the importation of a species, the species itself and any parasites/diseases that come with it. The issues paper does not assess the pest potential/hazard of the species • Past introductions of exotic aquatic organisms into South Australian waters have arisen through aquaculture, aquarium releases of unwanted ornamental fish species and stocking for recreational angling activities, as well as through biological control attempts. While the species may have a low pest potential/risk in South Australia due to very specific spawning requirements that are unlikely to be met in South Australian ecosystems, this issue should be considered and noted. • The BIRA guidelines which this paper has used, includes the consideration of pest potential, as such the issues paper should also consider this, or outline the previous consideration of this matter. 	<ul style="list-style-type: none"> • The Issues Paper should consider the pest potential in addition to the disease risks. • While the pest potential has been considered in the past for these species as being lower risk for establishing a breeding population in most areas of Australia, this should be noted in the issues paper so that all the issues are captured. Any imports of exotic fish/organisms should assess the pest hazard in addition to the disease hazards.
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1.4.1	Background	<ul style="list-style-type: none"> • Missing background on the pest assessment in the past. • Past documentation should be considered for completeness in the issues paper- There is a 2008 risk assessment on pest issues - Risk Assessment on the Import of Russian Sturgeon (<i>Acipenser gueldenstaedtii</i>)- Report Prepared for GHG Enterprises Pty Ltd By Ecos Environmental Consulting. This found sturgeon are a low risk for establishing a breeding population in most areas of Australia and some selected small areas (Tas and NSW) may offer suitable habitat. This report was provided in past consultations on this species. 	<ul style="list-style-type: none"> • Under A <u>Strategic Approach to the Management of Ornamental Fish in Australia</u> the species was agreed through an expert technical workshop for addition to the national noxious list, as sturgeon species were identified as being both high risk and of no interest to industry or hobbyists. This matter should be considered in the issues paper.
3.1	Potential Hazards		As above- should also consider/note pest potential.

4	<i>"biosecurity plans"</i>	Biosecurity plans for aquaculture generally only consider disease risks	The development of biosecurity plans for aquaculture facilities that have sturgeon (and any exotic species) should consider pests in addition to disease mitigation, to manage all the biosecurity risks for culture of an exotic imported species.
Page 5. Paragraph 1	<i>"As beluga and Siberian sturgeon are classified as exotic in South Australia, they may be held by a person but cannot be released, deposited or permitted to escape into any waters."</i>	<i>"As beluga and Siberian sturgeon are classified as 'exotic' (and 'aquaculture fish') in South Australia, they may be held by a person but cannot be released, deposited or permitted to escape into any waters without a permit."</i>	Sentence edit