

Shellfish Import Advisory Committee (SIAC) meeting summary

November 1, 2018

Point No Point Treaty Council (conference room)

19472 Powder Hill PI NE

Poulsbo, WA

Attendees: Ralph Elston, David Fyfe, Brady Blake, and Chris Eardley; By phone: Brian Joseph, Tim Carpenter (separate briefing on 11/07). Not in attendance: Diane Cooper, Carolyn Friedman.

Suggestions for next meeting: There was a suggestion to include someone from Washington Department of Fish and Wildlife (WDFW) Enforcement at a future committee meeting, for policy and enforcement insights. WDFW will seek some Enforcement involvement in meetings depending on agenda content.

Updates: WDFW submitted comments to the Food and Drug Administration (FDA) via the [Federal Register](#) (and directly) re: European Equivalency Determination and resulting imports of live molluscan shellfish. WDFW's concern is that many of the European Union (EU) countries have known shellfish disease issues and imports could be a vector for shellfish disease introduction. WDFW received no resulting engagement from the FDA. Advisors suggested United States Department of Agriculture-Animal and Plant Health Inspection Service (USDA-APHIS) may be a better avenue and WDFW has been talking with David Fyfe about putting together a proposal through Pacific Rim Shellfish Sanitation Association (PacRim)/Interstate Shellfish Sanitation Conference (ISSC) to start with a labeling convention or educational campaign. Ideas for what proposal should look like are welcome. Chris will reach out to FDA for an update on the comments submitted. It was pointed out that similar imports are already coming in to Washington (WA) from New Zealand, South Korea, Canada, and Mexico. WDFW feels a need to address this now, before growth in exchange between EU countries and WA. The group discussed a potential need to explore authority to regulate market-ready shellfish; WA Department of Agriculture is also not regulating these products.

*Note: WDFW met with David Fyfe following meeting and it was later decided that the format for this proposal will involve highlighting the issue for PacRim/ISSC and asking them to develop proposals. David feels this may have higher chance of success.

WDFW plans to boost awareness by the public and other groups that might be a risk to introduce/spread shellfish disease. The program has been doing internal messaging to raise the issue, which helped lead to a funding proposal. They also connected with the Washington Invasive Species Council. Their page lacked a shellfish sub-page, and they added one for Shellfish and OsHV-1. [That page is now live](#), and they are willing to support additional messaging and labeling. This is a small step, but might open other doors.

Permitting: The WDFW Shellfish Program has been looking at the permitting process and how long it takes to turn around a permit. This was revealing, and a more streamlined process is being initiated.

New permitting forms on the WDFW website will be available soon. The format should lead to quicker turn around for permits and free staff time for other work. There is also work being done on an online application process, where folks might be able to apply for permits with the press a button. Timeline on this is now uncertain with WDFW staff turnover.

Aquatic Invasive Species (AIS) Unit: The importation of live crayfish for use in schools has led to introductions of non-native species in other states. Crayfish are carriers of white spot syndrome virus, a virus confirmed as present in a state from which imports may have originated. WSSV or other diseases associated with imported crayfish could impact native decapods. WDFW Shellfish has worked with WDFW Aquatic Invasive Species Unit to phase a school system crayfish import permit out (crayfish are currently a prohibited group by WDFW AIS); this is the last year of that exceptional permit. The sources of crayfish will be contacted and WDFW is steering schools to alternatives to reduce risk.

Updating prevention strategies: In what will be a multi-year project, a major goal of the program is to have a west coast/state wide response plan if there is a breakout. This is a multi-year project. Chris went to a marine diseases workshop and hopes to glean from work with this group for a response plan. This work will involve the SIAC closely.

Import Requirements: People don't read the WAC and/or can't find the WAC which outlines general import requirements; it is also vague on detail and isn't very readable. WDFW hears from many constituents with questions on requirements and is planning to produce something easily accessible and readable on the WDFW website, and would like to bring it to this committee to be vetted.

12 month permit: The group discussed how to structure import permits in a way that is efficient for both WDFW and applicants. Currently, permits are issued for 12 months and pegged to the calendar year. All permits are coming in at once, which creates backlogs. Also, disease screening /testing results are issued according to 12 month validity, which may or may not align with the permit. This sometimes results in expiration before folks have a new batch of animals to test, and they would like some leeway; the rigid calendar year also makes collections for aquaria difficult due to dive training (safety certification) calendars—this group would also benefit from a new structure (note: this was also discussed at the April meeting). WDFW is open to restructuring the timing of permitting as long as it remains effective at managing risk. Some suggestions from advisors include instituting a “date certain” on permit expiration, but bracketing by a month on other side to account for the vagaries of seed availability for testing; WDFW could always make exceptions on a case by case basis if needed. This could be pegged to the validity of the sampling, rather than the calendar year—something WDFW has considered—and centered in a part of the year that WDFW would like for sampling to occur. WDFW should define what this “grace period” is (formally or informally) so people don't attempt to take advantage. WDFW could also make use of permit extensions as a tool. Other suggestions included splitting the total sample size over two sampling events—perhaps at different times of year; scaling sampling requirements to the size of the operator or facility.

Requiring OshV-1 testing: WDFW is proposing requirements for OshV-1 testing, which has advisor support. The group discusses timing of testing--does it make sense to shift that toward June or July? Is

that the right time to test for OsHV-1? Regarding temperature and timing of testing considerations: Advisors suggest there may be no one-size-fits-all box, it may be more appropriate to approach on a case by case basis. Modern PCR methods should be sensitive enough to detect OsHV-1 risk even outside of peak temperature months.

Denman Island Disease (DID): A discussion on finalizing approach to DID ensued, carrying over from the April SIAC meeting. Advisors pointed out that there are other ways to mitigate risk for DID—such as focusing on higher-risk older animals, using tools (temperature, quarantine) to purge the parasite, and additional screening. The group agrees that importation of higher-prevalence stocks should be avoided and advisors suggested setting a threshold—perhaps using the survey data available (Elston et al 2015) and WDFW (2018, unpublished). Advisors felt that there was validity in using the early-mid 2000s data from Elston et al. 2015 and that there is evidence that Kumamoto oysters are higher risk, justifying a different approach for this species. WDFW has also considered the threshold idea and will consider formalizing this for 2019.

Advisors offered suggestions to reduce risk, using DID & Humboldt Bay stocks as an example:

- Have a pre-screening at the source at which the brood stock would be taken off of bottom culture and held in a facility where they can be cleaned up and culled;
- Testing to find background level (at source, destination);
- Considering a lower-risk window of allowable import opportunity;
- Making use of isolation facilities and temperature treatment;
- Confirmatory testing following treatment – seeking levels reduced to zero or below threshold
- Consider how to enforce the requirements you choose to adopt—this may be an issue (WDFW responds that it has become more active in inspecting sites prior to permitting, can do follow-up inspection, and that additional testing can be used);
- Then brood stock can be released from strict isolation facility and used in a hatchery.

The group discussed WDFW's desire to begin requiring testing of broodstock animals representative of hatchery production of animals to be imported to WA. This helps WDFW to validate hatchery health in places it lacks jurisdiction or has inability to visit and ensures producers are thinking about potential risk to hatcheries by incoming animals. Broodstock, as older animals often spending periods in the marine environment, are often a higher disease risk. There was support for this among the group as this is a universally-accepted "fundamental standard" approach to animal health at the international level. The risk of infected broodstock to progeny is not limited to vertical transmission. WDFW would like additional industry and disease expert input on this measure and will follow up with advisors that could not make the meeting.

Formal disease classification: The WDFW Shellfish Program is in the process of formally updating definitions of classification and placing shellfish diseases within those classifications, and will consult with the committee as that progresses. The shellfish program hopes to have something more substantial to talk about by spring. DID is likely to be considered within a lower risk classification.

Pooling of samples: One advisor asks WDFW to clarify its stance on pooling of samples. WDFW clarifies that it has no issue with pooling according to accepted standards.

Quarantine Manual: WDFW receives a lot of inquiries from a wide diversity of constituents wanting to import animals and would like to make formal quarantine guidelines available. The Shellfish Program has been inspecting facilities—both to promote biosecurity and also to learn about what is out there and what should be required. WDFW is constructing a manual, and has asked the committee for comment. WDFW envisions a Sea Grant-type of document with call out boxes, etc. The group discusses the complexity of the manual and whether it can be enforced, whether imports requiring this much biosecurity should even be permitted at all. WDFW does not want to stifle research for lower levels of risk. For the highest level of risk, the answer is No and WDFW has issued some denials. There are standards in other applications that might provide some useful guidelines. WDFW has approached enforcement using pre-approval site visits and can opt to conduct follow-up visits to verify compliance. Review is on a case by case basis and still will be even after the document is published. Another suggested approach is to use levels of classification. Another advisor urged WDFW to consider existing vs. new facilities and how these standards might impact existing facilities that may not be able to update their systems; there was a suggestion to consider ways of “grand-fathering in” some facilities using alternative risk reduction tools—especially if WDFW has a familiarity with the facility and relationship with the operators.

Program Funding Proposal, 2019-2021 Biennium

The WDFW Shellfish Program has been working internally to highlight the importance of shellfish diseases and managing associated risk. This program has not historically received dedicated funding for disease control, even though a lot of time is spent on it. The program was invited to develop a [proposal for dedicated funding](#) and the proposal that that the program was able to advance and which now sits with the Office of Financial Management is for \$100,000 per annum. The intent is to fund a (Shell)Fish Health Specialist, and provide a budget for testing. The proposal includes 50% funding for a Fish Health Specialist, a small boost in technician FTE, and a budget for some form of testing (surveillance, response, baseline survey work). Actual design will be worked out later if it gets approved. WDFW is in a climate of budget deficit and it is not the best time to be asking for money, yet this proposal was one of a few that made it through to OFM so WDFW is hopeful. We wait to see how far it goes. WDFW will share more information as it is permitted to.

Next Steps:

- Finalize and publish import requirements, quarantine manual, new forms
- ISSC proposal development (targeting Spring 2019)
- Disease classifications
- Pathologists Qualifications – WDFW may work with the committee will develop a list of approved pathologists and qualifications. The Committee viewed this as potentially useful, with an emphasis on defining standards; American Fisheries Society may not be the most appropriate standards for shellfish.

Website - WDFW will have a new website on line early next year, and will have shellfish health, quarantine, document, import requirement and other pieces discussed here. There is also a strategy in place for managing genetic risks with an advisor and WDFW will hopefully be contracting with WA Sea Grant. The website will also be set up for reporting mortalities and will collect information all in one place in an ArcGIS database. One advisor pointed out that PSI has projects for things like this – sponsoring testing (Seed Health). That could be a good place to start. Any producers realize the results are public since it is paid for with money PSI gets from Sea Grant. There have been 15 incidents since April. WDFW would like to get those results even if they are negative. One advisor suggested to make a PSI/WDFW connection.