

# 漁農自然護理署

九龍長沙灣道三〇三號  
長沙灣政府合署五樓



## AGRICULTURE, FISHERIES AND CONSERVATION DEPARTMENT

Cheung Sha Wan Government Offices  
303 Cheung Sha Wan Road,  
5th floor, Kowloon, Hong Kong

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### Review of Comments

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Comments that are marked in red are where updates to the certification have been made.

1. New Zealand Ministry of Agriculture and Forestry

**New Zealand submission to the Hong Kong  
Agriculture, Fisheries and Conservation Department (AFCD)  
on the proposed draft import conditions for horses**

**April 2011**

New Zealand (NZ) would like to express its appreciation for the opportunity to provide a submission on the draft documents made available for consultation.

The ability to include multiple horses in a table or attached schedule will assist with reducing the level of documentation required for consignments, and hopefully allow some streamlining of the process for both the exporting country and for Hong Kong.

Given NZ's freedom from equine influenza, the removal of testing for equine influenza for horses to be permanently imported into Hong Kong is appreciated.

**AFCD: AFCD is required to test all imported horses as part of our conditions for approval of pre-export quarantine facilities to export to Australia.**

**Health status**

From a NZ perspective where there is a very low level of disease present, we would like to see the following changes:

- (1) reduce the frequency of equine viral arteritis (EVA) testing to only one test
- (2) no requirement for testing for equine piroplasmiasis
- (3) reduce the number of vaccinations against equine influenza (EI)

(1) Hong Kong is one of the few countries that require two EVA tests as a condition of import, and this testing regime is not aligned to the testing recommended by the World Organisation for Animal Health (OIE).

Completing two EVA tests during pre-quarantine has caused issues on a number of occasions for horses from NZ. Problems with horses being sensitised by vaccination has also caused problems with 'toxic' EVA tests for a proportion of horses.

If two equine influenza vaccinations are now to be required as part of the preparation for export to Hong Kong, it is anticipated that this could cause an increase in the number of occurrences of 'toxic' EVA test results.

**Recommendation 1:** that the testing for EVA be amended to include an option for a single EVA test, leaving the current two tests as an option for those horses that are not negative but have a stable titre.

**AFCD: We will amend the import requirements to allow for this**

(2) NZ is free of equine piroplasmiasis, and lacks the vectors that normally spread the disease. While iatrogenic spread cannot be completely ruled out, NZ requires testing of all imported horses for equine piroplasmiasis, and historically this has been very effective at maintaining NZ's disease free status.

**Recommendation 2:** that the import requirements for equine piroplasmiasis be amended to include an option for country freedom.

**AFCD: The OIE does not allow for country freedom in lieu of testing and neither do several other trading partners. The requirement to be tested will be retained.**

If the testing for equine piroplasmiasis does stay mandatory for NZ, we would like to see the option of the ELISA test included. Currently, NZ sends any IFAT testing to an overseas laboratory, and requiring an IFAT test result prior to export may cause timing issues.

**Recommendation 3:** that the testing requirements for equine piroplasmiasis be amended to include an option for using an ELISA test.

**AFCD:** The IFAT test is more sensitive and so is used in preference to the ELISA.

(3) NZ has never had an outbreak of equine influenza, and is one of the few countries that have been able to maintain disease freedom for this virus. From a NZ perspective, a requirement for two vaccinations could have two impacts:

- (a) the time requirement for two vaccinations will increase the preparation time for horses
- (b) the Hong Kong Jockey Club requirement for vetting of horses within the 30 days prior to the start of PEQ, and the delays associated with the final selection of horses to enter PEQ, makes the timing of a first vaccination difficult to manage
- (c) the vaccines for EI currently registered for use in NZ are 'Only for use in horses intended for export.'
- (d) for some horses, the two vaccinations may cause more problems with 'toxic' EVA test results

As the Hong Kong Jockey Club have a requirement for the careful vetting of horses within the 30 days prior to the start of PEQ, and the conditions for acceptance are stringent, on average up to 30% of horses proposed for Hong Kong do not get accepted. If the requirement for EI vaccination includes 2 vaccinations prior to export, as the second vaccination cannot be done during the last 14 days prior to export, this means that the first vaccination will be given up to 30 days prior to PEQ.

As NZ tightly controls the use of EI vaccine in NZ, if the horses are to be vaccinated against EI before they have passed their vetting criteria, this could mean up to 30% of horses proposed for Hong Kong will be vaccinated but not exported, which is against NZ's conditions regarding the vaccine use.

The EI vaccines currently registered for use in NZ allow for a booster vaccination 3-4 weeks after the first vaccine. At some time in the future, if NZ has to change to an EI vaccine that only allows a booster vaccination 4-6 weeks after the first vaccine, this would further push the date of the first vaccination out to a minimum of 3 weeks prior to entry to PEQ.

If NZ takes a strong stance in only allowing horses **confirmed** for export to be vaccinated against EI, but the Hong Kong Jockey Club vetting period is not extended past 30 days, could mean that only horses that have been approved by the Hong Kong Jockey Club **prior to 21 days before the start of PEQ** will be able to have their first vaccination against EI in time to start PEQ.

**Recommendation 4:** that the vaccination requirements for equine influenza be amended to include an option for a single vaccination on entry to PEQ for countries with country freedom from that disease.

**AFCD:** Part of AFCD's risk mitigation measures in preventing an outbreak of EI is to ensure that the entire equine population in Hong Kong is adequately protected against EI. A primary course of vaccinations prior to import is considered essential for adequate protection. AFCD's recognition from other countries that EI is well controlled within Hong Kong is also dependant on these measures being in place. AFCD does not have any involvement with HKJC's vetting procedures and the exporters should approach HKJC directly on these matters. Thank you for raising the possibility that in future if the EI vaccine in NZ changes then this may pose problems, we will address this issue when/if it arises. As AFCD understands the first vaccination can be done 15 days prior to entry into PEQ allowing the second vaccination to be completed before 14 days prior to export. This seems like a realistic requirement as preparation for the horses must start in advance of the start of PEQ. If NZ takes a strong stance on only allowing horses confirmed for export to be vaccinated the HKJC vetting can occur anytime in the 30 to 15 days prior to PEQ.

## Other issues

Section VI (b) of the draft import conditions for horses permanently imported into Hong Kong has the clause 'The PEQ meets AFCD requirements.'

To be able to sign that clause, the certifying veterinarian needs to either know first-hand what the AFCD PEQ conditions are, or must know that the PEQ was approved by either AFCD, or as the result of an audit or inspection by an Official Veterinarian.

**Recommendation 5:** that the clause relating to the AFCD requirements for PEQ be amended to read 'the PEQ has been approved as meeting AFCD requirements', with further information provided on how the approval is achieved.

AFCD: We will amend this clause. At the moment AFCD considers that if the competent authority is satisfied that the PEQ meets their export standards and HKJC is satisfied with the PEQ, then this is considered to meet AFCD requirements. AFCD will develop a set of requirements for PEQ at a later stage and all exporting countries will be informed accordingly.

2. United Kingdom Exporter via Defra

[Exporter's details not provided.]

## **AMENDED IMPORT CONDITIONS FOR HONG KONG**

### **PERMANENT IMPORT**

Section 1: Horses must be from same PEQ – will prevent horses not able to travel at end of one quarantine joining from another quarantine currently running (e.g. TALLEY CLOSE). Don't see this as a major problem as normally only have one quarantine running at a time.

**AFCD: Horses can come from different PEQ, but they must just use a separate health certificate.**

Section 111:

(d) No allowance for horses from other EU member states (Tripartite Countries only) but they and Annex appear in footnotes (Germany, France, Italy, Denmark).

**AFCD: Correct, only for Tripartite countries is joint residency allowed. AFCD will consider further countries if required at an appropriate time.**

(e) Horse not been on premises infected with AHS in past 3 months – Annex only says 60 days.

**AFCD: This has been updated to say 60 days.**

Section V:

(a) Needs to say except EVA

**AFCD: We will amend this.**

(di) Will we need to attach tests from South Africa – not normally included as part of the import paper to EU.

Can third option be done in country of export prior to arrival in GB or does it mean it needs to be done in UK?

**AFCD: No the tests from South Africa will not be required, further clarification has been added.**

**Further clarification will be added that this option is only applicable for horses that are only imported directly from South Africa.**

(diii) 'vaccine registration with relevant government authority' – government authority doesn't have any policy! Don't suppose they will change to Racing Authority policy?

**AFCD: As far as AFCD is aware all vaccines must be registered with the Veterinary Medicines Department in the UK. We are unsure what is meant by "government authority doesn't have any policy". We are aware that British Racing Authority and FEI policy allows for a primary EI vaccination course consisting of 2 vaccines given 2 weeks apart but AFCD has not found any data to support that this regimen is effective in providing proper immunity and is contrary to the vaccine's registered use. AFCD cannot accept this off-label use for horses imported into Hong Kong as it will not ensure that these horses are sufficiently protected.**

(div) PCR influenza test not currently available in this country. I believe VLA are supposed to be setting one up but have not let us know costs/turn-around times or life expectancy of swabs! Will it be necessary to taxi swabs to VLA etc? At least 4 days' prior to export – should this be 'not more than'?

**AFCD: Thank you for raising the PCR issue. AFCD will now allow for the rapid ELISA tests but the must be done within 48 hours of export.**

(xiv) Japanese Encephalitis vaccine not currently licensed in this country.

AFCD: This vaccination is not mandatory.

#### Section VI

(a) PEQ premises approved by 'competent authority' ?DEFRA – currently approved by LVI

AFCD: We accept the current approval process but a set of AFCD requirements will be developed at a later stage and all stakeholders will be informed.

(c) Horses examined for ticks within 24 hours of export – if ticks present premises treated, horses re-examined, HK Gov advised and accepted – approval document attached – is this turn around time feasible?

AFCD: This policy has been in place for many years without any problems. Steps such as inspection by quarantine staff during PEQ prior to veterinary inspection should prevent any issue arising. AFCD will as far as possible respond within this time with a verbal approval.

Other changes: Bloods (except EVA) now taken 7 days after start of quarantine.

AFCD: Correct.

Note: Only one 'flu test (currently 3). No strangles test. No EHV1,4 vaccination – all currently done as complementary tests/vaccinations but not required as part of health paper.

AFCD: We only require one influenza test. However, independently of AFCD, HKJC does require additional testing and vaccinations. HKJC should be consulted on their requirements.

(Some of these points also apply to other certificates but may not have been noted!)

#### TRANSHIPPING

Needs Annex for 60 days residency decs.

AFCD: As these consignments are low risk, no Annex is required.

No fluvac requirements (no vacs within 14 days of export) but still need to attach flu vac history to export cert?

AFCD: Vaccination history is only needed for rabies and Western and Eastern equine encephalomyelitis if the horses is vaccinated, otherwise no vaccination history is required.

Now only needs negative Coggins test within 14 days of export – no Piro.

AFCD: Correct.

Flu testing – at least 48 hours prior to export – should this be within 48 hours of export? If so, will this be possible with VLA PCR or will DEFRA allow us to continue to use Directigen Flu kits?

AFCD: We will amend the wording to say within 48 hours. The PCR or Directigen or ESPLINE tests are allowed. AFCD suggests that you contact Defra to determine what they will allow.

Horses examined for ticks within 24 hours of export – if ticks present premises treated, horses re-examined, HK Gov advised and accepted – approval document attached – is this turn around time feasible?

AFCD: As previously stated.

Footnote 2 – approval for exemption for transshipment horse export cert – might this apply for Macau?

AFCD: This has yet to be determined but as the shipments to Macau are offloaded in Hong Kong and then transported to a barge for sea transport to Macau, there is a higher risk with these consignments that

problems may be encountered and they may have to come in close proximity or contact with the local Hong Kong population of horses. So it is unlikely that this will apply to Macau shipments.

## TEMPORARY IMPORT

Needs Annex for residency decs.

AFCD: As these consignments already allow for residency in many countries prior to import into Hong Kong, no Annex is required.

4-6 week primary flu course

AFCD: We are unclear regarding your question/statement.

Flu swab during 48 hours prior to departure – will this be possible with VLA PCR or will DEFRA allow us to continue to use Directigen Flu kits?

AFCD: As previously stated.

Horses examined for ticks within 24 hours of export – if ticks present premises treated, horses re-examined, HK Gov advised and accepted – approval document attached – is this turn around time feasible?

AFCD: As previously stated.

## RE-ENTRY OF HONG KONG RESIDENT HORSES

Annexes for residency declarations

AFCD: As these consignments already allow for residency in many countries prior to import and Hong Kong will be one of the previous countries of export, no Annex is required.

### SECTION III

(a) Will need declaration (from whom?) re country of permanent residency

AFCD: no declaration is required.

### SECTION IV

(a) During entire stay in the countries, the horse has been held in officially approved isolation premises.....

Will need declarations to confirm the above if been in other countries.

Will need derogation for this country as racecourses do not have isolation premises for horses in training unless only here for one race – horses coming over for e.g. Royal Ascot and Newmarket July will need an 'isolation' base with access to training facilities and permission from DEFRA and Hong Kong to use facilities once other local horses have finished exercising (eg in the afternoon).

AFCD: Yes, declarations will be needed if the horses have been in another country besides the UK and Hong Kong. No derogation will be issued; the horses have to remain in an isolation premise. If this is not possible then the horses will have to return to Hong Kong under the permanent import requirements. The purpose of the horses remaining in isolation is to reduce the risk of disease transmission to these horses. Horses in isolation can train, as long as there are biosecurity measures in place to ensure that their health status is not compromised.

### SECTION VI

(iii) 4-6 week primary flu course

AFCD: We are unclear regarding your question/statement.

- (iv) Flu swab during 48 hours prior to departure – will this be possible with VLA PCR or will DEFRA allow us to continue to use Directigen Flu kits?

AFCD: As previously stated.

- (xiii) Japanese encephalitis vaccine not licenced in this country.

AFCD: As previously stated.

- (h) Horses examined for ticks within 24 hours of export – if ticks present premises treated, horses re-examined, HK Gov advised and accepted – approval document attached – is this turn around time feasible?

AFCD: As previously stated.

#### FOOTNOTE

(5 & 11) 60 day residency in country of export? Presumably this means resident in Hong Kong rather than country of export?

AFCD: We will update this.

3. United Kingdom Defra

**DEFRA (UK) COMMENTS ON AMENDED IMPORT CONDITIONS FOR HONG KONG**

**A. PERMANENT IMPORT**

Section I: Horses must be from same PEQ – UK requests consideration is given (eg waiver, on a case by case and need basis) to enable horses which have successfully completed PEQ (for HK) and certified to the same health standard to travel together.

AFCD: The intention was not that horses must be from the same PEQ in order for them to travel together, it was that one health certificate per batch of horses from one PEQ was required. So there can be two batches of horses from different PEQ on the same flight but with 2 health certificates rather than one.

Section III:

- (d) UK suggests that this paragraph provides an option for horses which have been resident in a 'scheduled' EU MS (Germany, France, Italy or Denmark) for at least 60 days to be certified (through a PEQ) from the UK. The footnote and Annex 1 will need to be amended accordingly to accommodate this.

AFCD: We will consider this further at a later stage but because this has not been raised previously as an issue, we will not include it in the current import requirements.

- (e) 'Horse not been on premises infected with AHS in past 3 months' – UK understands the intention is to standardise the period for which (premises) assurances are required to 60 days and suggests that this is amended to 60 days. Annex 1 already specifies 60 days for AHS.

AFCD: We will make this amendment.

Section V:

- (a) Requires samples to be taken at least 7 days after entry into PEQ. However, for EVA where paired samples are required, the first sample can be taken any time after entry into PEQ, and this should reflect that. UK suggests '(unless otherwise stated)' is also added after 'entry into PEQ'.

AFCD: We will amend this clause.

- (dii) The results of (AHS) tests are not normally attached to the certificate which accompanies the horse from South Africa. UK requests that a copy of the certificate, certified as true by the UK certifying veterinarian, is accepted in lieu.

AFCD: This clause has been updated, this is not required.

- (diii) 'vaccine registration with relevant government authority' – UK suggests this is rephrased .....according to the terms of 'the marketing authorisation and the manufacturer's recommendations'.

AFCD: As different countries use different terminology we will accept Defra's interpretation of this clause but AFCD is aware that representatives from manufacturers often make claims that the EI vaccine can be used off-label but do not have scientific data to support these claims. We do not accept off-label use of EI vaccines.

- (dv) 'At least 4 days' prior to export – To avoid confusion, UK suggests this is rephrased 'not more than 4 days .....'. The 4 day time frame remains challenging because of logistical problems that may arise (eg traffic jams on the M25, the main artery used to send samples from Newmarket - where the PEQs are - to the VLA, Weybridge for testing). UK requests that a waiver is considered in such an eventuality, to enable the shipment can continue as planned.

AFCD: we have amended this to allow for testing within 48 hours with the rapid ELISA tests.

- (xiv) (For information only): Use of Japanese Encephalitis vaccine is currently not authorised in the UK.

AFCD: noted.

Section VI

- (c) Horses examined for ticks within 24 hours of export – if ticks present all horses on premises have to be treated and re-inspected. However, HK needs to be advised their approval to export sought. UK is concerned that the flight might be missed if (HK on-call) personnel are not available to issue the approval document, and would like some flexibility to allow the shipment to take place (e.g. with additional/strengthened certification from the certifying veterinarian).

AFCD: We are available at any time to deal with this situation and if it does arise AFCD can be contacted and can verbally give approval if appropriate. AFCD would suggest that the inspection is carried out as close to 24 hours prior to the shipment so that it can be identified earlier.

**B. TRANSHIPPING**

Some comments for Permanent imports will be applicable here too.

Section IV:

- (d) It appears assurances are only required for residency in the exporting country, even though the horse may have been in other 'scheduled' countries during the previous 60 days. UK requests confirmation as to whether this is correct.

AFCD: Yes, this is correct.

Section V:

- (b/c) There is no requirement to vaccinate against equine influenza. UK requests confirmation that this is indeed the case.

AFCD: Yes, this is correct.

- (d) There is no requirement to test for equine piroplasmiasis. UK requests confirmation that this is indeed the case.

AFCD: Yes, this is correct.

- (diii) Samples for equine influenza tests are required 'at least 48 hours prior to export'. UK assumes this is intended to mean 'within 48 hours of export', in which case, it suggests a 4 day window (as with Permanent imports). Otherwise, logistically impossible to meet.

AFCD: We will amend this. AFCD considers a "pen-side" test (ESPLINE/Directigen tests) can be practically conducted with 48 hours of export.

- (f) Ticks – same comments as under Permanent imports.

AFCD: Please see previous response.

Footnote 2:

Approval for exemption for transshipment horse export cert. It appears this will be considered on a case by case basis, but as Macau tends to follow HK requirements, UK wishes to know if transshipments to Macau will be considered favourably by HKAFC.

AFCD: This has yet to be determined but as the shipments to Macau are offloaded in Hong Kong and then transported to a barge for sea transport to Macau, there is a higher risk with these consignments that

problems may be encountered and they may have to come in contact with the local Hong Kong population of horses. So it is unlikely that this will apply to Macau shipments.

### C. TEMPORARY IMPORT

Some comments for Permanent imports will be applicable here too.

Section V:

- (e) An Annex for the 60 days residency in the country of permanent residency as well as covering the temporary residencies in the other countries is required. The official certificates for movement between the various countries are unlikely to cover the range of diseases in the table.

AFCD: We do not need an Annex. Yes, the official certificates are unlikely to cover the range of diseases listed in the table but requiring supplementary information for these shipments will result in logistical issues and possibly result in consignments being rejected due to lack of supplementary information.

Section VI:

- (div) Samples for equine influenza tests are required 'at least 48 hours prior to export'. UK assumes this is intended to mean 'within 48 hours of export', in which case, it suggests a 4 day window (as with Permanent imports). Otherwise, logistically impossible to meet.

AFCD: Please see previous response.

- (h) Ticks – same comments as under Permanent imports.

AFCD: Please see previous response.

### D. RE-ENTRY OF HONG KONG RESIDENT HORSES

Some comments for Permanent imports will be applicable here too.

Section V:

- (e) It appears assurances are only required for residency in the exporting country, even though the horse may have been in other 'scheduled' countries during the previous 60 days. UK requests confirmation as to whether this is correct.

AFCD: Correct in part, to further explain, for section V(e) no other assurances are required but documentation is required for certification from other countries (see Section III (c)) and that isolation is required for the entire time away from Hong Kong as detailed in Section IV. Further amendments have been made to clarify this.

Section VI:

- (div) Samples for equine influenza tests are required 'at least 48 hours prior to export'. UK assumes this is intended to mean 'within 48 hours of export', in which case, it suggests a 4 day window (as with Permanent imports). Otherwise, logistically impossible to meet.

AFCD: Please see previous response.

- (h) Ticks – same comments as under Permanent imports.

AFCD: Please see previous response.

Footnote 5:

To avoid confusion, and to ensure alignment with footnote 11, references to Macau, and country of permanent residency should be deleted. Footnote 11 makes it clear that the country of permanent residency is HK.

AFCD: We will update this.

4. International Racehorse Transporter (IRT) Australia

**HORSES PERMANENTLY IMPORTED INTO HONG KONG**

**SECTION III HEALTH INFORMATION**

The horse has been in combined residency in Australia and New Zealand for at least 60 days prior to the date of export and a duly completed **Annex I for Australia or New Zealand is attached to this document.**

IRT – welcome inclusion.

**AFCD: Thank you.**

**SECTION V TESTING AND VACCINATION (7&8)**

(a) Whilst the horse is in PEQ blood samples were taken from the horse at least 7 days after entry into PEQ and subjected to the following tests with **negative** results (unless otherwise stated) in each case(8).

IRT – This shouldn't cause too many problems as the testing for EVA is exempt from this clause which would have made it difficult. The only foreseeable problem maybe if there is a non-specific reaction on the Hendra Elisa test and the SNT test is required.

**AFCD: Noted.**

**iii. Equine influenza vaccination**

**During the 90 days immediately prior to export the horse was administered:**

A primary course of approved vaccinations against equine influenza comprising of at least 2 doses with an interval of 4 to 6 weeks or according to the terms of vaccine registration with the relevant government authority.

**OR**

A booster vaccination against equine influenza which was given within 12 months of a primary course, or within 12 months of a booster vaccination where it, and any other previous booster vaccinations, had been administered annually within a regular 12-month period since the primary course (which consisted of at least 2 doses with an interval of 4 to 6 weeks or according to the terms of vaccine registration with the relevant government authority).

IRT – This is back to the conditions for the 2 years post Equine Influenza Outbreak. Pre-EI Outbreak & current certification "A single dose of approved vaccine against EI was administered after entry to PEQ but not within 14 days of export".

**AFCD: Correct, this is to ensure that all horses imported into Hong Kong are fully protected against EI. This approach is also adopted by some trading partners.**

**vi. Equine Piroplasmiasis**

The indirect fluorescent antibody test (IFAT) for *Theileria equi* and *Babesia caballi* on \_\_\_\_\_(9)

IRT – Question why Australian Horses would be required to test when we have country freedom.

**AFCD: Due to the problems associated with piroplasmiasis testing and the many cases of inconclusive testing that have been encountered with imports into Hong Kong AFCD will keep this requirement for imports. The OIE does not allow for country freedom in lieu of testing and neither does NZ or Australia.**

**viii. Hendra virus**

No case of Hendra virus infection has been reported in the exporting country/Macau in the last 2 years.

**OR**

An ELISA test on \_(9). If the ELISA test was positive then the horse was tested for with the SNT on \_\_ (9).

IRT – Addition of the SNT Clause – good initiative as this is a common waiver request when there is a non-specific reaction under the Elisa Test.

**AFCD: Thank you.**

**ix. Nipah virus**

No case of Nipah virus infection has been reported in the exporting country/Macau in the last 2 years.

**OR**

An ELISA test on \_(9). If the ELISA test was positive then the horse was tested for with the SNT on \_(9).

IRT – Assuming there are no diseases of the same family which would require shippers to test for under this clause?

**AFCD: At the moment AFCD believes AQIS can sign freedom so this is not an issue.**

**(f) Pregnancy:**

the horse is not pregnant

**OR**

so far as can be determined the horse is less than 7 months pregnant and has been continuously resident, since last being covered, in an establishment or establishments in which no cases of contagious equine metritis or equine viral abortion have occurred during the last 12 months.

IRT – new addition... shouldn't cause problems with racing stock but seems short in comparison to RSA etc at 240 days.

**AFCD: Noted.**

**SECTION VI PRE-EXPORT QUARANTINE (PEQ)**

(c) The horse was thoroughly examined for the presence of external parasites by either an Official Veterinary Officer or a designated veterinarian within 24 hours prior to export. A systematic approach was undertaken with close examination of ears, false nostrils, under body areas (axilla, inguinal, under mandible), perineum, mane and tail.

IRT – Inclusion of the timeframe within 24 hours of departure (Unusual to be post the required 48 hour window for the wash and worm).

**AFCD: Noted, the 24 hours has always been an AFCD requirement.**

(g) No horses have been added to, or removed from, the quarantine group intended for export to Hong Kong without official notification.

IRT – what if a horse gets held back?

**AFCD: Then AFCD must be notified, no time frame is stipulated so this can occur after the event if there is an emergency.**

**HORSES TEMPORARILY IMPORTED TO HONG KONG**

**SECTION V HEALTH INFORMATION**

(b) While in this country/Macau the horse has not been mated, either naturally or by artificial insemination, or been resident on horse breeding premises for the last 60 days.

IRT – Due to the nature of Australian horse properties and training facilities this is very difficult to certify.

AFCD: Most of the horses that are temporarily exported to Hong Kong would be racehorses in training so this should not be too onerous to meet. An owner's declaration will be considered acceptable.

## **SECTION VI TESTING AND VACCINATION INFORMATION**

### **vi. Equine Piroplasmosis**

IRT – Question why Australian horses would be required to test when we have country freedom.

AFCD: Please see previous response.

## **SECTION XI ACKNOWLEDGEMENT BY THE CONSIGNOR OR HIS AUTHORISED AGENT**

(c) The duration of stay in Hong Kong shall not exceed 30 days unless approved by the Hong Kong Government.

IRT – this is quite short in comparison to other certificates around the world... Suggestion would be to request longer period. Circa 90 days?

AFCD: Noted, but we will keep it at 30 days and there is the ability to extend this period on a case by case basis.

## **HORSES TRANSSHIPPING VIA HONG KONG**

### **SECTION IV HEALTH INFORMATION**

(d) During the 60 day period immediately preceding export or for the entire period that the horse has been resident in the exporting country/Macau (if less than 60 days residency), the horse was continuously resident on holdings which did not have any cases of the diseases listed below during that time and did not suffer from any of these diseases.

IRT – Possible inclusion of OR scheduled country E.g NZ

AFCD: The option of "or for the entire period that the horse has been resident in the exporting country" will be applicable and allow for a shipment of NZ-AU-HK-3<sup>rd</sup> country.

### **SECTION V TESTING AND VACCINATION INFORMATION OF THE HORSE (10&11)**

(a) Based on the certification and laboratory results provided:

i. Blood samples have been taken from the horse within 14 days of export.

IRT – Can this be increased to 21 days to match most other countries import protocols?

AFCD: Amended.

(b) No vaccines have been administered to the horse within 14 days of export to Hong Kong.

IRT – should this be relevant for horses that are transshipping. Other countries might require/allow vaccine within 14 days. E.g Japan – "vaccinated prior to entering Pre-Embarkation Station" which is for a minimum of 7 days prior to export.

AFCD: Amended.

(f) **Pregnancy:**

the horse is not pregnant

**OR**

so far as can be determined the horse is less than 7 months pregnant

IRT – suggest a minimum of 240 days.

AFCD: Noted.

**NOTE: Removal of the clause under Health Information of horses re: not being a resident on a breeding property is a welcomed submission due to more and more breeding stock being required to transit HKG to travel further North.**

**AFCD: Noted.**

#### **SECTION VIII ACKNOWLEDGEMENT BY THE CONSIGNOR OR HIS AUTHORISED AGENT**

(b) Transshipment will not be longer than 8 hours in Hong Kong.

IRT – this is very definitive... would recommend reading as follows: “Transshipment will be scheduled to be no longer than 8 hours in Hong Kong”.

**AFCD: We will amend this clause**

#### **FOOTNOTES:**

2. Airlines/exporters/importers can apply to AFCD for approval to be exempt from a transshipment horse export certificate (i.e. only certification for the destination country will be required). This approval will be based on country of origin, transportation type, contingency plans and any other factors as determined by AFCD.

IRT – Assuming this is referring to when the airline confirms this is the same plane connecting through to the end destination and therefore the horses don't change planes in Hong Kong – please confirm.

**AFCD: No, for a shipment when there is no off-loading of horses, no permit or documentation is required at all. AFCD refer to this as “transit”. In the scenario where horses change plane or are unloaded, a permit is required but AFCD will in certain circumstances waive the requirement for export documentation/testing/etc. The exact requirements to allow for this still need to be established.**

## 5. Biosecurity Australia Comments

### Permanent imports:

#### Section III Health Information

##### (d) Residency

We are likely to run into problems with cross certification of horses that have been in NZ in the previous 60 days. AQIS will not certify to Annex 1 on behalf of NZ. We would not expect NZ to certify on behalf of Australia in this situation. An alternative might be to get the exporter to obtain certification from NZ as appropriate. Alteration of (d) in the residency statement, and the note to Annex 1 would thus be required. We may need to talk further on this one.

AFCD: Annex 1 would be completed by NZ, not AQIS. AFCD will accept that either it is 60 days if the horses are resident in Australia for the past 60 days or if the horses were resident in NZ, then it would be only for the time in Australia.

##### (g) Table

Where diseases are notifiable, certification will be backed by legislation. Where diseases are not notifiable, a vendor declaration will form the basis of certification.

Equine herpesvirus (all types) infection will certainly create certification difficulties. Herpesvirus infections in horses are usually latent and subclinical. It is unlikely that any premises with more than a few horses anywhere in the world could satisfy this requirement. I would suggest this certification be limited to managing abortigenic and neurotropic herpesvirus infections, which are notifiable in all Australian States and Territories.

AFCD: Noted, the declaration is acceptable. We will change it to just the abortigenic and neurotropic herpesvirus infections.

#### Section V Testing and vaccination

(iii) EI vaccination: Because Australia is EI free without vaccination, horses can only satisfy the primary course requirements, which cannot be less than 4 weeks. I understand that the soundness examination required by HKJC is only valid for 30 days – which will expire during vaccination for export, requiring a second soundness examination.

AFCD: Noted, please discuss this further with HKJC.

#### Section VI PEQ

(b) AFCD requirements are not specified.

AFCD: At the moment AFCD considers that if the competent authority is satisfied that the PEQ meets their export standards and HKJC is satisfied with the PEQ, then this is considered to meet AFCD requirements. AFCD will develop a set of requirements for PEQ at a later stage and all importing countries will be informed accordingly.

(c) tick inspections/acaricide treatments are usually done by an accredited veterinarian, and the horse remains isolated in the facility from other horses not of the same quarantine status. Shipments departing on a Monday will have difficulty meeting this requirement because of the time constraint – suggest this could be extended to 48 hour without compromising quarantine security.

AFCD: Noted.

## Section VIII Transport

(a) The words 'officially approved' don't have any meaning for certification in Australia. I would suggest the use of 'registered for use in Australia' to replace 'officially approved'.

AFCD: We consider that this is synonymous and have no objections to AQIS using this wording.

### Temporary imports:

As above but

## Section V Health information

(b) Certification of residence not on breeding premises will rely on a vendor declaration.

AFCD: Noted, the declaration is accepted.

## Section VI Testing and vaccination

(d) (iv) Australia is free of EI without vaccination – testing should not be required since any incursion will result in an outbreak being notified as in 2007. For Australia (and probably NZ) this section should be as in the permanent certificate, and allow declaration of country freedom. The turnaround required may necessitate use of antigen tests like Directigen.

AFCD: AFCD recently agreed with AQIS that all temporary and permanent imports from EI free countries must have either an Espline or Directigen test so that to ensure our PEQ can meet AQIS's requirements. AFCD will amend this if it will not affect the PEQ approval for export of HK horses to Australia.

Section XI declaration by consignor/Agent: Comment: 30 days seems short.

AFCD: Noted, this can be extended.

### Re-entry into HK:

## Section IV

(c) (iii) is the requirement for separation generic – I should such imports be separate from horses of all other countries – competing horses may be held together, but separate from horses of the host country (I think this happens in HK)

AFCD: Noted, this will be amended so that it is only HK horses that can be kept together.

## Section V

(a) (i) blood sample requirements for different countries may specify sampling which does not correlate with this requirement. It may be necessary to allow some leeway in timing requirements.

AFCD: We have not encountered this problem before for re-entry horses. We will address this on a case-by-case basis but as HK is importing the horse our requirements have priority.

### Horses Trans-shipping via HK:

## Section V

(a) (i) blood sample requirements for different countries may specify sampling which does not correlate with this requirement. It may be necessary to allow some leeway in timing requirements

AFCD: we have amended the conditions to allow for more leeway.

(b) Again some leeway in application of other countries' requirements may be necessary – suggest treat on a case by case basis to identify any difficulties.

**AFCD: we have amended the conditions to allow for more leeway.**

Section VIII declaration by consignor/Agent

(c) Agent suggests unable to guarantee <8hr in cases of technical delays by airline. Suggest reword: 'Transshipment will be scheduled to be no longer than 8 hours in Hong Kong'

**AFCD: Will amend.**

Footnotes

(2)Exemption is assumed to be for cases where horses are not unloaded. Is this the case?

**AFCD: for horses not changing aircraft or being offloaded no permit or health certificate is required. We will assess requests for exemption after implementation of the requirements.**

6. Macau Department of Food and Animal Inspection and Control

1. Regarding the issue of compulsory notifiable diseases, under the disease reporting scheme outlined in the Macau Jockey Club Regulation 54(A) the following 20 diseases would be considered as compulsorily notifiable to our department, including African Horse Sickness, Vesicular Stomatitis, Contagious Equine Metritis, Dourine, Epizootic Lymphangitis, Western Equine Encephalomyelitis, Eastern Equine Encephalomyelitis, Equine Infectious Anaemia, Equine Influenza, Equine Piroplasmiasis, Equine Herpes Virus 1 (Abortion and Central Nervous System Disease), Equine Viral Arteritis, Glanders, Horse Mange, Horse Pox, Japanese Encephalitis, Venezuelan Encephalomyelitis, Surra, Rabies and Anthrax.

We are confident that the Regulation is strictly upheld throughout these years and our department will continue to have close communication with Macau Jockey Club on this, should there be any suspicious case of compulsory notifiable diseases or other infectious diseases occurs on the premises MJC must notify our department within 24 hours. Grateful if you can consider the Macau Jockey Club Regulation 54(A) of compulsorily notifiable equine diseases is still be recognized as acceptable to HKAFCD, as such, we can complete the disease freedom status option if no case of certain equine diseases has been reported to our department in the required timeframe.

**AFCD: We consider this acceptable.**

2. Regarding the blood testing requirement, since Macau relies on the approved overseas laboratories for the blood testing of equine diseases, and constantly, Macau faces problems with running the blood tests within 14 days prior to export due to the logistics required with samples delivery, occasional customs hold up, limited operational hours of the laboratory, delayed report turnaround time and arrangement of transportation, and end up requesting for dispensations from HKAFCD. We would kindly request that HKAFCD considers the unique situation in Macau and make allowance that the 14 days can be extended to 14 working days, or possibly 21 days.

**AFCD: This is only applicable to the temporary import requirements, and only to equine piroplasmiasis and EIA, AFCD would like to continue dealing with this on a case-by-case basis.**

7. South African Department of Agriculture, Forestry and Fisheries

**1) Export Certificate for Horses Permanently Imported into Hong Kong**

a) Section III, Health Information, (e). We suggest the following for clarity:

“The exporting country/Macau has either been African Horse Sickness (AHS) free for the last two years and vaccination against AHS has not been practised for the last 12 months, or it has an officially recognised AHS Free Zone. AHS is a notifiable disease in the exporting country/Macau. The horse has not been on any premises where AHS has occurred in the past 3 months and the horse has not been infected with AHS in the past 3 months.”

**AFCD: We will amend this clause.**

b) Section III, Health Information, (g). We suggest the following for clarity:

“The horses have not been on any premises where the diseases listed below occurred during the 60 days prior to export, nor have the horses been infected with the diseases listed below during the 60 days prior to export. The diseases listed below have not occurred on the PEQ in the last 60 days.”

**AFCD: We will amend this clause.**

c) Annex 1: Additional Certification...., (b). South Africa would not be able to certify this clause. We suggest the following:

“During the 60 days immediately preceding export the horse has not been in any country in on any establishment where terrestrial rabies has been reported in the last 2 years or during the 60 days prior to export, the horse has not been exposed to rabies nor been on any premises where rabies has been reported.”

**AFCD: We will amend this clause.**

a) Annex 1: Additional Certification...., (c). We suggest the following for clarity:

“The horses have not been on any premises where the diseases listed below occurred during the 60 days prior to export, nor have the horses been infected with the diseases listed below during the 60 days prior to export.”

**AFCD: We will amend this clause.**

**1) Export Certificate for Horses Temporarily Imported into Hong Kong**

a) Section V, Health Information, (c). We suggest the following for clarity:

The exporting country/Macau is either African Horse Sickness (AHS) free for the last two years and no vaccination against AHS has been practised for the last 12 months, or it has an officially recognised AHS Free Zone. AHS is a notifiable disease in the exporting country/Macau. The horse has not been on any premises where AHS has occurred in the past 3 months and the horse has not been infected with AHS in the past 3 months.

**AFCD: We will amend this clause.**

8. Dubai Racing Club

**HONG KONG RE-ENTRY CERTIFICATE COMMENTS JANUARY 2011**

1. Where the certificate states “country/ Macau” this should have an \* with the appropriate deletion so that it is clear where the certificate is issued from.

AFCD: This has not been raised in any of the other submissions and making this change will mean the certifying veterinarian would have to make a deletion each time this clause is mentioned and will most likely lead to certification errors, so we will not include an asterix.

2. SECTION V (d) replace “vaccination” with “vaccinated”

AFCD: We will update this.

3. SECTION V (e) Equine Herpes Virus (all types) ? replace “all types” with abortigenic/neurologic?”. It may be difficult for a vet to certify that a horse did “not suffer” from a circulating herpes virus infection unless testing for it. Alternatively remove the “did not suffer from any of these diseases” in the condition above the table.

AFCD: We will update this.

4. SECTION VI (a) I The comment on Equine Influenza testing not being within 14 days is not applicable as it is not a blood test and can be removed.

AFCD: We will update this.

5. SECTION VI (d) i. ...in which AHS has been reported in the last 2 years and In which vaccination against AHS has been practiced in the last 12 months. The OIE Code on AHS is likely to change in the next couple of months to allow a containment zone for previously free countries with an outbreak to enable them to regain country freedom within 80 days. Perhaps this section could be reworded to allow for the changes to the OIE Code. Also the horse has not been on any premises *in which AHS occurred* and the .....

AFCD: We will consider updating this after the OIE amendment. We will change the wording.

6. SECTION VI (d) iii. Regarding Equine Influenza Vaccination. The options allow for the vaccine to be administered in accordance with the “terms of vaccine registration with the relevant government authority”. It is my understanding that the vaccine registration frequently only allows for the vaccine to be imported and distributed. It does not necessarily specify conditions of use other than “manufacturer’s recommendations”. Were a government to register a vaccine and specify use that was not in accordance with the manufacturer’s recommendations then there would be a conflict. The manufacturer’s recommendations should prevail in the use of the vaccine (as recommended by the OIE).

AFCD: We had not considered the scenario where the government authority only allows a vaccine to be imported and distributed as normally this includes its terms of use. In this scenario then the manufacturer’s recommendation in terms of what is stated in the vaccine instructions, is acceptable but AFCD is aware that representatives from manufacturers often make claims that the EI vaccine can be used off-label but do not have scientific data to support these claims. We do not support off-label use of EI vaccines.

7. SECTION VI (vi) Equine Piroplasmiasis. There are no piroplasmiasis positive horses in HK? If this is going to be a test for a returning horse then the exporting authority should know the status of the horse on entry.

AFCD: Yes, there are no piroplasmiasis positive horses in HK. This will be up to the exporting country (i.e. in this case UAE) to require this of the HK imported horse.

8. SECTION VI (vii) If the ELISA test was positive then the horse was tested for *Hendra Virus* with the SNT on.....

AFCD: We will update this.

9. SECTION VI (d) viii If the ELISA test was positive then the horse was tested for *Nipah Virus* with the SNT on.....

AFCD: We will update this.

10. SECTION VI (ix) Rabies. The horse has not , during the last 60 days *or since import\**, been in any country / Macau\* where rabies has been reported *in* the last two years. OR During the 60 days prior to export *or since import\** the horse....

AFCD: We will update this.

11. SECTION VI (d) x. Vesicular Stomatitis same comments as for Rabies apply.

AFCD: We will update this.

12. SECTION VI (d) xi. W/EEV The horse was kept in AFCD approved vector ~~proof~~ *protected* facilities for 21 days prior to export.

The conditions for vector proof facilities (as defined by DEFRA) are onerous and there would be very few facilities in the world that meet this definition.

AFCD: We are aware of this but this is in line with the OIE requirement for W/EEV.

13. SECTION VI (d) xiii Surra. The horse has been kept in vector protected facilities for 21 days prior to export *or since import if less than 21 days\**..... A blood sample has been taken 7 days after the start of isolation on the .....and tested using ~~an antibody detection ELISA and~~ microhematocrit centrifugation technique for surra. This is a returning horse and may not have time to seroconvert if only present for a short time. The vector protected stables and insect repellent should ensure protection and a blood smear can verify no current infection.

AFCD: We will update the wording. Sero-conversion can occur 10-19 days after infection. AFCD will add that ELISA testing is not required if the horse has only been in a surra infected country for less than 10 days.

14. SECTION VI (h) The time frame for inspection within 24 hours and for treatment in the case ticks are found do not allow time for the treatment option with notification to AFCD. Suggest 72 hours for the inspection.

AFCD: We are available to give verbal approval at any time.

15. SECTION IX should be SECTION VII

AFCD: We will update this.

16. SECTION IX The validity of the certificate should be 72 hours to allow for technical delays with the aircraft etc

AFCD: We will address this issue.

17. SECTION X should be SECTION VIII

18. SECTION XI should be SECTION IX

AFCD: We will update this.

## HORSES TEMPORARILY IMPORTED INTO HONG KONG

1. Many of the above comments for re-entry apply to the Temporary import certificate as well where they have common clauses.

2. SECTION II e) how long can a horse be "in transit" . In the EU for instance an "in transit" horse is frequently unloaded and held overnight in stables off the airport premises.

AFCD: this will be evaluated on a case-by-case basis. AFCD has concerns about this procedure as it possibly compromises the health status of the horses.

3. SECTION III d) why is it necessary to send copies of original documents? Surely the certifying veterinarian can sign that he has seen them and that they comply with the requirements.

AFCD: We will amend this.

4. SECTION IV b) iii) what is AFCD's interpretation of "same health status"? All horses imported into HKG will meet HKG Temporary import conditions therefore may be considered as of the same health status by HKG however the exporting country on return of their horses often specifies that horses may not mix except during racing. Under the exporting countries definition of "same health status" a returning horse will be a permanent import and therefore only horses entitled to permanent import from HKG would be considered as equivalent health status.

AFCD: We will amend this.

5. SECTION V d) As written a horse that has been vaccinated for VEE would be excluded from entry even if it had been out of an affected country for more than 2 years. It is suggested a time period during which the horses had been vaccinated is added.

AFCD: We will amend this.

6. SECTION VI) d) i) South Africa are looking at international racing and this clause as written would make onward transfer from South Africa difficult. It is suggested an amendment be made to allow temporary movements into a Free Zone.

AFCD: Noted. AFCD previously assessed South Africa's AHS Free Zone and are waiting for the issues raised after this assessment to be properly addressed.

7. SECTION IX The certification validity should be increased to at least 48 preferably 72 hours to allow for flight delays and weekends etc for signing.

AFCD: Please see previous response.

8. SECTION X b) The transport information will be signed in advance of the travel making it impossible for the certifying veterinarian to sign the clause as written. It is suggested "During this transportation, to the best of my knowledge the horse will have no contact with animals not of the same certified health status" is more appropriate.

AFCD: We will amend this.

9. FOOTNOTES 5 Permanent Residency. How is this affected by the EU which is a group of countries using a common certificate with frequent internal movements between countries.

AFCD: The certifying country will have to ensure this is met.

10. Horses from South Africa need to complete 60 days in another country before they can be imported temporarily into Hong Kong. Given the extensive pre-export quarantine for RSA 30 days should be sufficient for Temporary entry.

AFCD: As explained previously.

## **HORSES TRANSHIPPING HONG KONG**

Comments where applicable from the above two certificates apply.

AFCD: Noted.

## HORSES PERMANENTLY IMPORTED INTO HONG KONG

Where applicable comments from above apply.

1. SECTION III d) the residency requirements for permanent importation are broader than for temporary entry and at least partially address the comment raised above regarding the Footnotes. It is not clear why the Annex needs to repeat clauses e) and f) of this section nor why surra is added to the equivalent clause in the Annex when the body of the certificate allows for testing.

AFCD: The Annex repeats clauses e) – f) as AFCD recognises that some countries have difficulties certifying conditions that are beyond the scope of their knowledge, this provides the document that fulfills the knowledge gap. As far as AFCD is aware surra is not present in South Africa, New Zealand, Australia nor the tripartite countries so there is no need for an option for surra testing.

2. SECTION V iv) It seems inconsistent that a horse destined to mix with the local population should be permitted a nasopharyngeal swab for influenza within 4 days of export while a temporary imported horse is required a swab with 48 hours of export. The vaccination requirements are identical for both entrants.

AFCD: We will amend this requirement so that all testing is within 48 hours of export and with either PCR/Directigen/ESPLINE as it is now a requirement for HK's PEQ approval by AQIS.

3. SECTION V xii) the requirement for vector proof facilities as noted above should be replaced with vector protected in order to allow compliance.

AFCD: As explained previously.

4. SECTION VI b) the certifying veterinarian will need to know AFCD requirements for the PEQ before he can sign the certificate unless the requirements are clauses c) through j) in which case this should be specified.

AFCD: At the moment AFCD considers that if the competent authority is satisfied that the PEQ meets their export standards and HKJC is satisfied with the PEQ, then this is considered to meet AFCD requirements. AFCD will develop a set of requirements for PEQ at a later stage and all importing countries will be informed accordingly.

5. SECTION VI c) The time frame between checking for parasites and the export is too short should there be any ticks found. One would assume that since there is a requirement for tick treatment within 48 hours (clause d) that this is merely to confirm the tick treatment has been effective.

AFCD: As explained previously.

6. ANNEX 1 b) ... "in where terrestrial".. should be "in which terrestrial".

AFCD: We will amend this.

9. United States Department of Agriculture

1. USDA would like to continue to use the existing bilaterally-agreed May 2010 protocol for the permanent importation of Equines from the United States into Hong Kong.

AFCD: All trading partners are required to comply with the new import requirements. This is in line with the WTO principle of trade without discrimination. Hong Kong is a signatory to the WTO.

2. USDA would like to endorse the certificate in their standard method of placing the seal over the unique health certificate number in the upper right hand part of each page. The signature of the issuing and endorsing veterinarians would be on the last page.

AFCD: AFCD will accept the USDA's current practice of applying a seal over the unique certificate number in the upper right hand corner of each page and only signing on the last page.

3. With regards to the requirement for original copies or endorsed laboratory test and vaccine certificates, the United States would like to note that it is not standard practice for the endorsing veterinarian to endorse laboratory result. Therefore, the United States respectfully suggests the following alternative statement: "The original or copies of all health certificates, laboratory tests and vaccination certificates (unless recorded in the horse's passport) from all countries/places listed in SECTION VI(c) & Section VI(d) have been attached to this Horse Information Document."

AFCD: AFCD requires the endorsing veterinarian endorse the laboratory results. AFCD has had several instances where it was found that the incorrect test had been performed while the certificate states the correct test had been done. This measure will assist to prevent incorrect certification in future. Your suggested amendment is not adequate to address the issue.

4. With regard to the separate export certificates for transit and temporary importation (export certificate 2 and 4), the United States would like to suggest a bilateral certificate for both the transit and temporary importation of horses into Hong Kong.

AFCD: Please refer to the point 1 above.

10. Japan Ministry of Agriculture, Forestry and Fisheries

### 1. for Horses Permanently

**SECTION III(a), SECTION VI(c) SECTION VII** : We'd like to Hong Kong accept that the official veterinarian inspect the horses within 48hours prior to shipment instead of within 24 hours prior to shipment.

AFCD: Noted.

**SECTION V(d) vi**: Japan is free from Equine piroplasmosis. We propose that Japan certify that Japan is free from Equine piroplasmosis instead of IFAT negative.

AFCD: Due to the problems associated with piroplasmosis testing and the many cases of inconclusive testing that have been encountered with imports into Hong Kong AFCD will keep this requirement for imports. The OIE does not allow for country freedom in lieu of testing and neither does NZ, Australia and Japan.

**SECTION VI**: Please let us know "AFCD requirements".

AFCD: At the moment AFCD considers that if the competent authority is satisfied that the PEQ meets their export standards and HKJC is satisfied with the PEQ, then this is considered to meet AFCD requirements. AFCD will develop a set of requirements for PEQ at a later stage and all importing countries will be informed accordingly.

### 2 for Horses Temporarily

**SECTION IV(b) i** : We'd like to clarify "screw worm". It is favorable that "screw worm" would be amended to "screw worm(*Cochlioma hominivorvax* and *Chrysomya bezziana*)" .

AFCD: Screw worm is commonly known as these species so there is no need for an amendment.

**SECTION V**: We'd like to Hong Kong accept that the official veterinarian inspect the horses within 48hours prior to shipment instead of within 24 hours prior to shipment.

AFCD: As stated previously.

**SECTION VI(d) iv**: Hong Kong propose that a nasopharyngeal swab was collected from the horses during the 48 hours prior to shipments .We'd like you to accept the sampling is done during 48 hours prior to shipment. As some quarantine stations is far from our laboratory, we'd like to have more time.

AFCD: Noted, your department also requires testing within 48 hours which provides logistical challenges. Two of the tests listed are 'pen-side' tests so there is no need to send samples to a laboratory.

**SECTION VI(d) vi**: Japan is free from Equine piroplasmosis. We propose that Japan certify that Japan is free from Equine piroplasmosis instead of the IFAT

AFCD: As stated previously.

**SECTION VI(h), SECTION IX**: We'd like to Hong Kong accept that the official veterinarian inspect the horses within 48hours prior to shipment instead of within 24 hours prior to shipment.

AFCD: As stated previously.

### 3.for Horses Re-entry

**SECTION IV(b) i** : We'd like to clarify "screw worm". It is favorable that "screw worm" would be amended to "screw worm(*Cochlioma hominivorvax* and *Chrysomya bezziana*)" .

**SECTION V, SECTION VI(h)** : We'd like to Hong Kong accept that the official veterinarian inspect the horses within 48hours prior to shipment instead of within 24 hours prior to shipment.

**SECTION VI(d)iv** : Hong Kong propose that a nasopharyngeal swab was collected from the horses during the 48 hours prior to shipments .We'd like you to accept the sampling is done during 48 hours prior to shipment. As some quarantine stations is far from our laboratory, we'd like to have more time.

**SECTION VI(d)vi, SECTIONIX**: Japan is free from Equine piroplasmosis. We propose that Japan certify that Japan is free from Equine piroplasmosis instead of IFAT negative.

AFCD: As stated previously.

4. for Transshipping

**SECTION IV(a), SECTION V(f) i, SECTION VI** : We'd like to Hong Kong accept that the official veterinarian inspect the horses within 48hours prior to shipment instead of within 24 hours prior to shipment.

**SECTION V(d)iii** : Hong Kong propose that a nasopharyngeal swab was collected from the horses during the 48 hours prior to shipments .We'd like you to accept the sampling is done during 48 hours prior to shipment. As some quarantine stations is far from our laboratory, we'd like to have more time.

AFCD: As stated previously.