

MEMO**ATTENTION**

Rebecca Clarkson

FROM:

Carina Sim-Smith

CC**DATE:**

9 May 2024

REGARDING

Review of NWML Biosecurity Management Plan

BACKGROUND AND SCOPE

Northwestern Mussels Ltd (NWML) have applied for consent for a new green-lipped mussel nursery off the coast of Raglan. Waikato Regional Council have issued a s92 request that I review NWML's draft Biosecurity Management Plan (BMP; dated Feb 2024) for the mussel nursery to ensure that it adequately implements the requirements described in my biosecurity assessment of the nursery (Sim-Smith, 2022).

REVIEW OF BMP

My biosecurity assessment recommended that a BMP include:

- requirements for no stock transfers onto the nursery, apart from hatchery spat;
- mandatory cleaning and 12-week land storage for any ropes that have been used outside of the nursery;
- regular surveillance and recording of the abundance of pest species, new species to the area, or any unusual mortality on the farm;
- reporting the occurrence of unwanted organisms or suspected disease to the Ministry for Primary Industries (MPI);
- providing appropriate training for farm staff in pest surveillance and biosecurity management;
- cleaning and decontaminating all removable farm equipment prior to redeployment in distant areas;
- cleaning fouling organisms off floats and ropes during harvest, and rotating floats to expose fouled surfaces to the sun;
- antifouling all farm vessels according to the manufacturer's recommendations;
- cleaning and decontaminating farm vessels and vehicles before travel between management areas or operational zones;
- washing down vessel decks and emptying or flushing bilges and any other contained spaces before leaving the farm or arriving at the farm;
- keeping accurate records of all stock transfers (i.e., date, origin and destination locations, quantity transferred, and health and performance of stock);
- regular review of the plan periodically, or in response to a new biosecurity incursion.

In general, the draft BMP largely implements the requirements described in my biosecurity assessment. Some corrections/additions are required to the draft BMP, which are listed below.

REQUIRED CORRECTIONS

SECTION 7.2

- The first bullet point needs to be amended to “Farm structures shall be inspected at least monthly when spat/growing ropes are in the water for marine pests. Records of the inspections shall be kept.”

SECTION 7.3

- The BMP needs to include a requirement regarding harmful algae such as “No stock shall be transferred off the nursery if harmful algal concentrations in the area exceed concentrations where flesh testing is required (see MPI, 2022), or if a potential biosecurity event is reported in the Operational Zone.”

SECTION 7.4

- The BMP needs to outline a requirement for “bulk bags containing drying rope to be clearly labelled with the start date of land storage” so that rope is not mistakenly deployed before the 12-week drying time is fulfilled.
- The section on “Marine Equipment–All Areas”—the bullet point on floats needs to be amended to “All floats (including niche areas) will be regularly cleaned of obvious fouling at sea to prevent biofouling accumulating on floats. Floats brought onto land will be further cleaned (if needed).”
- The sections on “Marine Equipment–Other Management Areas/Operational Zones” and “Marine Equipment–Industry Management Areas” needs to include a requirement that “any dive gear used within the previous 14 days in another Management Area must be decontaminated in accordance with the decontamination standards in the A+ Biosecurity Standards prior to use in another Management Area.”

SECTION 7.5

- The bullet point on “Bilge water and/or water in the strum...” needs to be amended to “...if travelling between Management Areas or Operational Zones”.
- The bullet point on washing down trailered farm vessels needs to be amended to “Prior to use in different Management Areas or Operational Zones, trailered farm vessels and equipment will be washed with freshwater and all water drained from bilges on land prior to leaving the Management Area or Operational Zone of origin, or in an area where wash water cannot enter the Coastal Management Area”.
- The bullet point on vehicles needs to be amended to “Any vehicle/trailer...will be between each transport event to the West Waikato Management Area. Cleaning shall occur prior to leaving the Management Area or Operational Zone of origin, or in an area where wash water cannot enter the Coastal Management Area”.

SECTION 10

- The forth bullet point needs to be amended to “ If a new unwanted organism is found or a notifiable biosecurity event occurs, NWML.....”
- In addition to an annual review of the BMP by the farm manager, the following points need to be added:
 - “The BMP shall be reviewed and updated, if appropriate, by an independent suitably qualified and experienced person(s):
 - Every 3 years; or,
 - Within 2 months of a new unwanted organism being detected on the nursery.”

APPENDIX 3

- First sentence in Appendix 3 needs to state that MPI and Waikato Regional Council need to be informed immediately if a new pest or disease is detected.

MINOR CORRECTIONS

Table 1 lists some minor errors in the BMP that require correction.

Table 1. Minor corrections required for the NWML draft Biosecurity Management Plan.

Page	Line	Error or correction required
12	1	The picture in the <i>Caulerpa brachypus</i> / <i>Caulerpa parvifolia</i> row is of <i>Caulerpa taxifolia</i> not <i>C. brachypus</i> / <i>C. parvifolia</i> . Note that while <i>C. taxifolia</i> is a notifiable organism (currently not present in New Zealand), <i>C. brachypus</i> and <i>C. parvifolia</i> are not notifiable organisms, only unwanted organisms.
17	3	Missing a word: “NWML may in future use the proposed nursery to on-grow....”
19	row 3, point 3	Reword to: No spat or seed from any other Management Area or Operational Zone will be transferred onto the farm. In future.....

If all the above points are made to the draft BMP, I am satisfied that it adequately implements the requirements described in my biosecurity assessment.

REFERENCES

MPI (2022). Regulated control scheme – bivalve molluscan shellfish for human consumption. Animal Products Notice. Ministry for Primary Industries, Wellington. 70 pp.

Sim-Smith, C. (2022). Biosecurity assessment of proposed Waikato west coast mussel nursery. Coast & Catchment report 2022-19 prepared for Northwestern Mussels Ltd. 37 pp.