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KOI
SOCIETY
OF WA

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Federal Minister for the Environment
Honorable Mr. Greg Hunt

CC:

W.A. Minister for Environment, Honorable Mr Albert Jacobs

RSPCA Australia

Animals Australia

KOI HERPES VIRUS AND THE INTENTION TO RELEASE THIS INTO THE AUSTRALIAN ENVIRONMENT

Dear Minister Hunt,

I have been asked to write to you on behalf of the Koi Society of Western Australia.

It is prudent to keep this letter brief and we will attempt to air our concern that a Government Department has been reviewing a virus which, we understand will be released into the Australian waterways with a target date of 2017. The intention is to kill large numbers of common carp.

We note that we have not been included in any correspondence regarding this issue, despite the devastating effects it will have on our hobby and the related industry; and we ask that we be included in any relevant future correspondences.

We ask that the Ministers consider the following points of issue, these are simple statements and examples; they are not an exhaustive listing of all facts. The vast majority of scientific research overseas clearly points to the fact that both morally and scientifically, releasing such a virus, WILL NOT reduce numbers of common carp in the medium to longer term. Indeed, recovery is swift as approximately 15% of fish will survive to reproduce, and they and their offspring do demonstrate immunity to the virus. We may well ask ourselves, "what then?"

Is there a need for carp control?

Carp are thought to be the reason for the rarity of native Australian fish in some water bodies, as they can account for up to 90% of the biomass. But are they the pest that everyone makes them out to be? Are we blindly accepting this assumption that they have out-competed the native fishes of their habitat and are destroying the environment? Is that finding a cause or effect? Are carp merely scapegoats to cover the fact that natural environmental changes (decreased rainfall) and human-related activities (diverting water for irrigating farms, damming, livestock damaging river banks, recreational activities, fertiliser, herbicide, pesticide and other chemical run-offs) may have caused significant changes to the aquatic environment?

Carp have soft lips and they are not territorial or aggressive. How then can they out-compete native Australian carnivorous fishes like the silver perch and Murray cod? These native fish are among the top predators and they are highly territorial and aggressive. Carp would provide a ready food supply for these native fishes. How are carp more harmful to the environment than the non-native trout and salmon (again, top predators) that are regularly stocked in pristine rivers and dams for the purposes of recreational fishing?

Carp have also been listed as a noxious species in Victoria and Queensland, a declared exotic species in South Australia, and a controlled fish in Tasmania. In WA, NSW and NT; koi carp may still be kept in aquaria, garden ponds and farm dams. One may ask why is there a discrepancy between states? Perhaps this is related to competition with recreational fishing in rivers stocked with non-native salmon and trout.

Controlled releases in North America of KHV devastated wild stocks of carp. Tens of thousands of fish were reported as suffering and dying. In most cases it is clear the public relations and clean up was ill prepared and the outcome was a major embarrassment to local and federal governments in these areas. More importantly, the carp stocks have recovered and are now immune to KHV. Such experiments are well publicised on the internet.

It is estimated in WA alone that over 50,000 people keep koi fish. The release of the highly contagious KHV threatens every fish in a garden pond. Will there be compensation for fish lost due to KHV?

Why we should NOT use koi herpesvirus

While superficially the idea of purposefully introducing a virus to control populations of other species appears to be a good idea, we would suggest that a lot more research be done before a risk-benefit (and consequences) analysis is ever attempted.

Purposefully introducing a virus as lethal as KHV into the environment, in an attempt to control carp populations, is not only foolish, but it is highly irresponsible. It clearly illustrates the lack of knowledge of the pathophysiology and epidemiology of this (or perhaps any) herpesvirus. It is not a 100% kill, there is a carrier state and over time, it is inevitable that fish will develop resistance to the virus. Then there would no longer be any benefits.

It clearly illustrates a lack of understanding of ecosystem succession and evolution. Carp can provide a food source for larger native animals (fish, birds, etc.) where other species do not thrive. With the extraordinary levels Australia has historically taken to protect its animal and plant resources, and the experience with numerous similar past approaches (e.g. controlling cactus, rabbits, cane beetles and many other examples) Australia would have learned of the dangers.

In this day and age, it is not considered good animal welfare to release a biological control agent that can cause fish to die of necrotising sores on their body and gills, haemorrhaging through their gills and sunken eyes. The infected animals will rest near the water surface, swim lethargically and exhibit distressed breathing and uncoordinated swimming. Internally, there may be adhesions in the body cavity and enlargement of internal organs. The debilitated animals can succumb to secondary bacterial and parasitic infections. It will take one week for the fish to die at a water temperature of 26 degree Celsius and up to 3 weeks to kill at 17 degree Celsius. It is clearly evident that these fish will be in great pain and suffer immensely if the virus is released.

There is yet no treatment for KHV. Koi carp are much loved pets. Some are passed on from one generation to the next and are an heirloom. Can it be fathomed that someone could release a viral disease that causes death by such means in order to control feral cats and dogs? Practices which were acceptable in the 1950s in terms of inflicting pain and suffering on 'pests' should not be tolerated today.

Koi herpes virus is a devastating disease of ornamental koi and common carp. Have the social repercussions of releasing this virus been considered? There are renowned koi breeders internationally who have committed suicide due to the destruction that KHV have caused to their life's work. Would the government want to be held responsible for this?

We understand that Australian research so far has shown it to be species-specific, yet the research has not covered all native Australian aquatic vertebrate species. In fact, Dr Sven Bergman and co. in Germany have

been working on KHV, and recently they found that KHV is not entirely host-specific. KHV can infect crucian carp, grass carp, bighead carp, silver carp, tench, sheatfish, wild carp, vimba bream and sturgeon, to name but a few.

KHV is an internationally reportable disease (e.g. OIE). Australia remains free of this OIE-listed disease. It will dramatically impact future export of, not only carp (e.g. Koi), but perhaps all Australian finfish. Once it is released, it is dubious whether it can be kept under control in Australia, especially since there are no tests that definitively detect all KHV carriers or survivors.

Why on earth would we risk doing this?

In conclusion; research on wildlife preparedness in Australia published by the Invasive Animals CRC (2008) revealed that feral cats were ranked highest for their impact on social and biodiversity values, and wild dogs were also high on the rankings. Bearing this in mind, and knowing that there is no cure for KHV, it is inconceivable that a responsible Government would release a viral disease that causes death by necrosis and haemorrhage in order to control feral cats and dogs?

Koi carp are much loved pets to many of us who have spent a lifetime in the hobby. This virus is highly contagious and will wipe out our hobby and the commercial industry.

We look forward to a response to this letter from the Minister(s).

Yours sincerely,

Shona Macskasy
Secretary, Koi Society of Western Australia.