

IAIS 003.4

**Live Eels and Rock Lobsters
Circular 1995**

Promulgatory Statement

This circular:

- is issued pursuant to **Regulation 19** of the Fish Export Processing Regulations 1995
- may be referred to as the *Live Eels and Rock Lobsters Circular 1995*
- comes into force on 1 May 1995
- applies to all licensees of fish premises.

Andrew McKenzie
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(acting pursuant to delegated authority)

Malcolm Cameron
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Explanatory Note

This circular is issued under the Fish Export Processing Regulations 1995.

This note and other explanatory notes found boxed in bold italics are not part of the circular, but are intended to explain the circular.

The circular sets out certain “industry agreed implementation standards” concerning acceptably humane methods of killing eels and rock lobsters.

To comply with Part VII of the First Schedule to the Regulations, you must kill eels and rock lobsters using a method appropriate to the species and described in this circular, or have an alternative proposal approved by the Chief Meat Veterinary Officer under delegation from the Director-General of Agriculture and Fisheries.

The methods of killing eels and rock lobsters (including crabs and all other crustacea) have been discussed with the Animal Welfare Advisory Committee (AWAC) as meeting acceptable humane standards.

Approved methods of subsequent processing of eels and lobsters are described in IAIS 003.5.

You must still comply with any other relevant law or by-law, or your licence conditions.

If you have any questions about this circular, you should ask your local Inspector.

Amendments

Suggestions are welcomed for alterations, deletions or additions to this circular to improve it or to make it better suited to the needs of the fishing industry and inspection staff. Suggestions should be forwarded to the co-ordinator, together with reasons for the change and any relevant experimental or documentary data.

Amendments do not become part of a circular until they have been issued pursuant to the Fish Export Processing Regulations 1995, along with an amendment form. Amendments are numbered in sequence.

- # Amendments to the circular can be identified by the issue number in the page header and the
- # symbol # in the left margin adjacent to the line on which the change has been made.

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Amendment Record

It is important that this circular is kept up-to-date by the prompt incorporation of amendments.

To update this circular when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue. Complete instructions will be given on the covering letter accompanying the amendment. File the covering letter at the back of the circular and sign off and date this page.

If you have any queries, please ask your local Inspector.

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1. Introduction

1.1 Subject Matter of the Circular

This circular sets out the approved manner of killing live eels and rock lobsters referred to in **Part VII of the First Schedule to the Regulations**.

1.2 Definitions

In this circular:

Regulations means the Fish Export Processing Regulations 1995, and a reference to a Regulation is to a provision of the Regulations.

Your local Inspector means the Inspector who inspects your premises or the Inspector's deputy.

All words and expressions defined in Regulation 2 of the Regulations have the same meanings when used in the circular, except where the context requires otherwise.

2. Live Eels

2.1 Regulatory Requirements

The regulations state:

“All eels intended for processing, and that are not to be exported alive, shall be —

(a) Killed in an approved manner”.

2.2 Approved Methods of Killing Eels

2.2.1 Under **Clause 1, Part VII, of the First Schedule to the Regulations**, the approved methods of killing eels which are not to be exported alive are those laid down in Sections 2.2.2 - 2.2.4.

2.2.2 Salting

The eels are placed in a container of salt. The container may be tumbled. After about 2 hours in the container, the slime will have been removed from the surface of the eels and they will have been rendered “unconscious” (immobile) in readiness for processing.

2.2.3 Electrical stunning

A DC is preferable to an AC current because it minimises blood splash and backbone damage from convulsive shock. Whichever method is used, the treatment should be gentle, and spread over several minutes.

Stunning should be carried out in small batches. This is so that the eels can be processed quickly before they revive.

Tanks must be designed so that there is no risk to the operator. Tanks are commonly made of non-conducting fibreglass. A safety switch on the lid is essential. The drain plug must be constructed in such a way that it cannot be removed by eels in the tank.

2.2.4 Freezing

The eels are placed in containers directly into a freezer for a period of not less than 30 minutes.

3. Live Rock Lobsters

3.1 Regulatory Requirements

The regulations state:

“All rock lobsters, that are not to be exported alive, shall be killed in an approved manner”.

3.2 Approved Methods of Killing Rock Lobsters

3.2.1 Under **Clause 2, Part VII, of the First Schedule to the Regulations**, the approved methods of killing rock lobsters which are not to be exported alive are those laid down in Sections 3.2.2-3.2.4.

3.2.2 Tailing

Rock lobsters may be tailed using either of the following methods.

Tailing by hand knife

First, the knife is pushed through the top side of the rock lobster tail, just above the tail flap, to cut the gut string which runs down through the tail to the anus. The gut string contains waste material and must be removed to prevent bacterial and enzyme spoilage in the tail flesh.

The second step is to lift the tail and push the knife into the body. With the wrist action, the knife is moved around the underside of the tail and bent back over the body shell. As the tail is lifted, the gut string remains with the body.

Tailing by static knife

The tail is drawn on to the cutting tube, severing the anus cleanly. Then the rock lobster is drawn on to the blade and turned first one way and then the other, so that the blade follows neatly around the inside of the body cavity. The tail is lifted cleanly out of the body cavity, while the gut string remains undisturbed.

For further information on these methods of tailing, see “Rock Lobster Tailing” issued by the New Zealand Fishing Industry Training Council.

3.2.3 Chilling

Live rock lobsters are placed into an ice slurry for a minimum of 20 minutes before being processed in any other manner.

The ice slurry is made by filling a suitable container with normal crushed or flake ice and then adding potable water or clean seawater. The ratio of ice to water should be 3:1 and the cooling medium will then have a consistency of wet concrete.

Before the rock lobsters are placed in the slurry, it should be checked to ensure that a sufficient quantity of ice remains to maintain its temperature while the rock lobsters are immersed.

After removal from the slurry, if no movement occurs on handling and if the tail of the rock lobster is hanging limply rather than curling, the animal can be assumed to be dead.

The rock lobster can then be processed in the normal fashion.

Fish and crustaceans, including lobsters, are “cold blooded” animals. When their temperature is reduced, their body activity reduces and eventually they experience cold torpor, which is analogous to a stage of “hibernation”. This is a natural process for crustaceans. If their body temperature reduces sufficiently, they will die without suffering.

Australian research has shown that storage of lobsters in slush ice (i.e. about - 1 ° C) for up to 18 hours causes no loss in the edible quality of the tail flesh.

3.2.4 Freezing

A standard freezer at sub-zero temperatures can be used to attain the same effect as chilling but, as cooling is slower, the lobsters should be left in the freezer for a minimum of 30 minutes.

4. Unacceptable Methods of Killing Fish

The following methods are not acceptable for killing fish:

- any processing of crustaceans or fish involving cutting the “flesh” off a live animal, other than tailing as described in Section 3.2.2;
- dropping live crustaceans or fish into cold water and bringing the water to boil;
- dropping the live animals into boiling water.

The AWAC consider that crustaceans and fish are capable of feeling pain and therefore regards the above methods of processing live fish and crustaceans as inhumane.
