



Use of isoeugenol anaesthetics (e.g. AQUI-S) Fact Sheet for Australian Seafood Businesses

Q: What is isoeugenol?

A: Isoeugenol is a water dispersible liquid anaesthetic. It is a phenylpropene substance that is extracted from certain essential oils. In Australia, [AQUI-S®](#) is the only isoeugenol-containing product that is registered for use by the Australian Pesticides and Veterinary Medicines Authority (APVMA).

Q: What is the issue?

A: The recent trade recall of Australian eels from South Korea due to the presence of isoeugenol residues has highlighted to SafeFish that some non-salmonid seafood industries may be using AQUI-S® in their animal husbandry or transporting practices.

Currently, the only permitted use for AQUI-S® in Australia is in the handling and harvesting of Salmonids by or under the direction of a registered veterinarian and within the limitations of the APVMA registered product label ([click here for APVMA registration](#)).

Q: Can I use AQUI-S® with species other than Salmonids?

The use of this product, or any other veterinary product for any other purpose or in any other species that is not indicated on the label (i.e. off label use) is only allowed if:

- a [permit](#) has been issued from the APVMA or
- a Ministerial approval or permit has been issued from the state authorities for off-label use (only if applicable under State/Territory legislation) or
- a veterinarian has prescribed the off-label use of the medicine including dosage and withholding periods in line with relevant jurisdictional legislation

Please note that legislative requirements are different in each jurisdiction so seeking advice from your state authority is the first step.

Please use the APVMA search functions on their website to determine whether use of a veterinary medicine is permitted: <https://portal.apvma.gov.au/permits> and <https://portal.apvma.gov.au/pubcris>.

Q: What are the requirements for exporting seafood?

A: For fish to be exported as food the [Export Control \(Fish and Fish Products\) Orders 2005](#) requires:

- Schedule 5 – that fish are not to be fed or treated with a substance that could adversely affect the fitness for human consumption of the fish
- Schedule 6 – that fish and fish products for export as food must not contain an agricultural or veterinary chemical in an amount that contravenes the requirements of the Australian New Zealand Food Standards Code ([see Standard 1.4.2](#))
- Schedule 6 – describes that importing country requirements are to be met for agricultural or veterinary chemicals where they are different to those in Australia (controls to meet importing country requirements for use of agricultural or veterinary chemicals must be documented in the Approved Arrangement).

Q: Is off-label use of AQUI-S® for export going to be audited?

A: The Department of Agriculture and Water Resources (DAWR) audits export establishments against the requirements above. Establishments who are found at audit to be using agricultural or veterinary chemicals off-label without required permit or veterinary approvals will be found non-compliant and issued a corrective action request by DAWR's food safety auditors or DAWR's approved food safety auditors.

The APVMA also undertake compliance and monitoring as required, while jurisdictional authorities may also undertake compliance in response to reports of inappropriate use of chemicals.

Obtaining relevant approvals to use a chemical off label does not exempt animal produce from compliance with residue limits for food suitability or export/import requirements.