



Recommendation on Fish Health Good Management Practices

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Regulation (EU) 2016/429, also known as the Animal Health Law (AHL), provides a general legal framework and dictates harmonised principles for the entire animal health sector, reviewing and repealing the previous European Union (EU) legislation in light of the EU's strategy on animal health for 2007–2013: 'Prevention is better than cure'.

The AHL introduces a risk-based approach, highlighting the importance of prevention to good farming practices through the application of adequate biosecurity measures in farms and in-depth regulation of the approach to surveillance.

The AHL takes into account the "One Health" perspective (the animal health–public health link), the environment, food and feed safety, animal welfare, antimicrobial resistance and the production and economic aspects. Its general aim is to ensure high animal and public health levels in the EU by maintaining and improving the current health status of animals.

Prevention of animal diseases is based on the application of good biosecurity practices by farmers, veterinarians and allied animal health professionals validated and subject to control by public health authorities under the rules established by Regulation (EU) 2017/625 on 'official controls'. In particular, Article 25 lays down regular risk-based animal health visits for the purpose of disease prevention through biosecurity and the promotion of early disease notification. Delegated Regulation (EU) 691/2020, which supplements Regulation (EU) 2016/429 of the European Parliament and the European Council regarding the rules relating to aquaculture establishments and transporters of aquatic animals, precisely indicates the biosecurity measures to be adopted in aquaculture establishments to prevent the introduction of listed and emerging diseases.

Aspects related to animal health and beyond will have to take into account, as anticipated, other EU regulations that have recently come into force (i.e. Regulation (EU) 04/2019 on medicated feeds and Regulation (UE) 06/2019 on veterinary medicine products) or are under review, such as the regulatory framework on animal welfare, based on the roadmap established by the EC.

I. Fish Farm Good Management Practices and Biosecurity Measures

Depending on the structure of the aquaculture establishment, the biosecurity measures applied in the field can be very different. To ensure the control of the factors, risks and pathways leading to the spread of pathogens and diseases, including emerging diseases, biosecurity measures must be uniformly applied at the same time in all types of aquaculture production sites, and must ensure the active involvement of everyone concerned. Experience has demonstrated that, most of the time, breaches in sanitary surveillance programmes occur when one or several of the actors involved (not only farmers and farm technicians but



also local veterinary authorities) do not have the necessary knowledge of the biosecurity rules specifically applied in fin fish farming or do not have the financial capacity to ensure the setting up and follow-up of a good biosecurity plan.

Especially in terms of biosecurity, measures need to be adapted to the analysis of site-related risks, such as the production structure, production plan and farming management and environmental conditions. The company's own surveillance plan and the surveillance plan carried out by the public health services must also be built based on the results of a risk analysis.

The EU and national laws represent a framework in which most points related to biosecurity in aquaculture systems have been considered. This information must be accessible by and clear to the relevant authorities and the officials of professional organisations and must be easily understandable by most producers in this field, who often have very different forms of technical support based on the size, management and type of farm environment or farmed species.

Efficient control of the movements of live aquatic animals is required. A legislative framework for this is in place, but numerous cases of the transfer of live aquatic animals (particularly from extra-EU countries) are still not well documented and controlled.

A review of the relevant EU and national laws indicated that most aspects of biosecurity are considered in the regulations. The main critical step is the implementation of the recommendations and obligations in the field, at the farm and regional levels. The following points need to be addressed:

- Official veterinary inspectors and allied animal health professionals. Depending on the member state, a centralised body is in charge of conducting an aquaculture sector survey in terms of health management and biosecurity; in other member states, human resources are spread in each local administration with official veterinary inspectors in charge of a variable number of aquaculture establishments. In some cases, the official inspectors lack knowledge and experience regarding the legal framework on health and biosecurity and its practical application to fin fish farms.
- Intermediary bodies. Most large fish farm production sites have their own quality and health departments, with personnel in charge of biosecurity plans and measures. However, most small aquaculture establishments cannot afford to dedicate personnel and resources to the development of a biosecurity plan or to implement measures for the effective execution of the plan. Two examples of intermediate bodies (based on the characteristics of the different EU member states) are producer associations/organisations and health defence groups. These intermediary bodies are key

to establishing effective biosecurity measures in farms, dedicating adequate human and technical resources to and providing farmers with training and support for such a purpose.

- Producers' and stakeholders' information on biosecurity and training materials. Different actions have been initiated in EU member states to inform and train aquaculture producers about biosecurity. However, there is currently very limited information available from a cost–benefit analysis of biosecurity in the aquaculture business, which is key to encouraging the implementation of biosecurity plans by producers. The development of cost–benefit analysis specific tools for a for biosecurity, similar to those developed for other fish farming management activities, will greatly help promote biosecurity. Handbooks of good health management practices have been developed in different EU member states. Similar materials need to be developed to help the industry, veterinarians and allied animal health professionals implement biosecurity, transferring the information to producers and supporting their training.
- Movements of live animals. A real focus needs to be placed on the transfer of live animals, including ornamental fish, and the biosecurity risks related to them. Efficient control of the movements of live aquatic animals is urgently needed. A legislative framework for this is already in place, but the disinfection, control and certification procedures are still not harmonised at the member state level and often also at the local level, creating inequalities between operators that can also create problems regarding competitiveness and maintenance of a level playing field at the EU level.

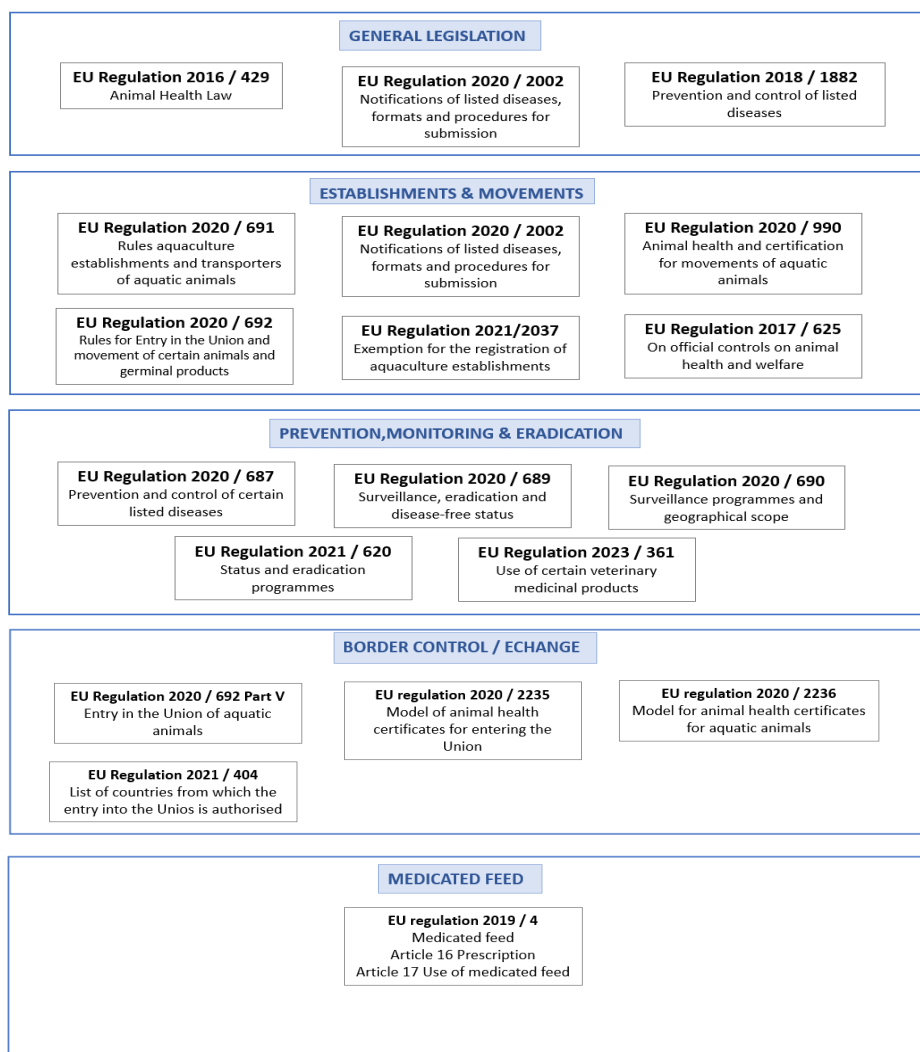
II. Recommendations

Based on the foregoing, the Aquaculture Advisory Council (AAC) recommends the following to the EC and its member states to guarantee an adequate health status for fish bred in compliance with the provisions of the AHL and the legislation that regulates all the related aspects:

- Procedures governing the maintenance of adequate biosecurity standards, animal health surveillance based on risk analysis in aquaculture through regular animal health visits by veterinarians and emergency plans for controlling emerging diseases must be adapted, developed, implemented and harmonised at the EU and member state levels, as required by Article 25 of the AHL.
- There is an urgent need to provide proper training for veterinarians and related animal health professionals in the aquaculture sectors (private and official veterinarians, health managers, intermediate bodies and competent authorities) on biosecurity as they are the key advisors of producers and implement biosecurity onsite with them.

Moreover, all stakeholders must be involved in the process, including the actors involved in the transport and trade of fish as well as the scientific community (i.e. in 'Better Training for Safer Food' courses).

- The EC must share handbooks of good health management practices developed in different member states, as well as generic or specific guidelines elaborated and published by it, through the EU Aquaculture Assistance Mechanism.
- The EC must direct the member states (particularly the intermediary bodies as defined above) to include as eligible for funding through the European Maritime Fisheries and Aquaculture Fund (EMFAF) the design, implementation, and maintenance of biosecurity plans of service contracts between producer associations/organisations or professional associations and veterinarians trained in the matter.





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