



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE.A.2/BVT

**Subject: AAC Recommendation on “Fish Health Good Management Practices”**

Dear Mr Thomsen,

I would like to thank you for your mail of 30<sup>th</sup> October 2023 including the “*Recommendation on Fish Health Good Management Practices*”.

As rightly mentioned in the Recommendation, a risk-based approach to disease surveillance and the application of appropriate biosecurity measures to prevent outbreaks of transmissible animal diseases, are important elements of Regulation (EU) 2016/429 (the “*Animal Health Law*”), as they also were under Council Directive 2006/88/EC.

In addition, I would like to remind you that animal health has been identified as a priority in the “*Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*”<sup>(1)</sup>. The guidelines announced that the Commission will map good husbandry practices for aquaculture related to health and welfare and organise trainings on these practices that could be supported using EU funding. In the context of the implementation of this action, the EU Aquaculture Assistance Mechanism is currently working on a “*background document on good husbandry practices for aquaculture*”. As you know, this draft document has been discussed with experts, including the Aquaculture Advisory Council (AAC), in a workshop on 18<sup>th</sup> October 2023.

The AAC recommends the following to the Commission and its Member States to guarantee an adequate health status for fish bred in compliance with the provisions of the “*Animal Health Law*” (AHL) and the legislation that regulates all the related aspects:

- 1) *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*

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<sup>(1)</sup> COM(2021)236 final  
Mr. Brian Thomsen  
Chairman of the AAC  
Email : brian@danskakvakultur.dk  
Rue de la Science, 10  
B – 1000 Brussels  
Belgium

*must be adapted, developed, implemented and harmonised at the EU and member state levels, as required by Article 25 of the AHL.*

Animal health visits which are carried out in accordance with Article 25(1) of the Animal Health Law, are the obligation of operators. They are made for the purpose of disease prevention and include the provision of advice concerning biosecurity and other matters, including the detection of, and information on, signs which may indicate the occurrence of listed or emerging diseases.

As many of the elements which should be taken into account concerning animal health visits are best known locally, we agree that Member States are best placed to further clarify the details of such visits, in collaboration with operators, veterinarians and aquatic animal health professionals. This is especially important given that animal health visits are carried out by veterinarians and aquatic animal health professionals, who comply with the requirements of Article 12 of that Regulation and who must maintain and develop their professional capacities related to such activities.

- 2) *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 'Better Training for Safer Food' platform provides specific training courses for competent authorities concerning the Animal Health Law. Five seminars and a conference were held in 2021, to introduce the details of the legislation to Member States and stakeholders. Please see [https://food.ec.europa.eu/animals/animal-health/animal-health-law/btsf-training-events\\_en](https://food.ec.europa.eu/animals/animal-health/animal-health-law/btsf-training-events_en) for information on those events.

In addition, two 5-day aquatic-specific training courses were held in January and September 2022, and two more courses, each of the same duration, will be held in December 2023 and January 2024. Officials from Member States attend these training courses not only to be trained themselves, but also to bring the information they have gathered, back to their own Member State, so that other officials, as well as stakeholders, may also be trained.

- 3) *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 EU aquaculture website includes a section "Knowledge Base" ([Knowledge base | EU Aquaculture Assistance Mechanism \(europa.eu\)](#)) where guidelines and good practices and experiences on aquaculture related topics (including animal health) are collected. Via the search function, one can find all the health-related documents. We have encouraged Member States and stakeholders to provide new content for the Knowledge Base and will continue to do so. Through the website one can also download and fill in a [document](#) to suggest new content for the Knowledge Base and then upload it in the section [User Submission Form](#). I would encourage you to submit such form regarding the specific health-related handbooks and guidelines that you have in mind.

- 4) *The EC must direct the Member States 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.*

The Commission cannot direct Member States as the AAC proposes. It is a key principle of shared management under EMFAF that the Member States decide (whilst taking due account of the list of ineligible operations/expenditure in Article 13 of the EMFAF regulation) what to fund according to their needs, as set out in their (Commission-approved) EMFAF programmes.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia RUBECK, coordinator of the Advisory Councils (Julia.Rubeck@ec.europa.eu; +32.2.296.88.89), who will forward them to relevant colleagues.

Yours sincerely,

Charlina VITCHEVA

c.c.: Cecile Fouquet : [cecile.fouquet@aac-europe.org](mailto:cecile.fouquet@aac-europe.org); [secretariat@aac-europe.org](mailto:secretariat@aac-europe.org);