



Recommendation on HPR-deleted infectious salmon anaemia virus (HPR-deleted ISAV)

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Index

Index	2
I. Background	3
II. Justification	4
III. Recommendations.....	5

I. Background

The AAC welcomes the European Commission's answer¹ of 1 July 2025 to our recommendation on the Animal Health Law² (April 2025).

The AAC agrees that on-farm clinical inspections may allow certifying officers to verify that requested animal health conditions are met prior to signing an animal health certificate.

The AAC also agrees that the basic requirements stipulated in Article 196 (1) of the Animal Health Law are not related only to HPR-deleted ISAV.

It follows from Article 196 (1) (a) that operators shall only move aquatic animals if they 'show no disease symptoms'.

HPR-deleted ISAV is unique for two reasons: All Member States are declared free of the disease, and there are no clinical symptoms in rainbow trout or brown trout following infection with HPR-deleted ISAV under farm conditions. Therefore, as confirmed by the EU Reference Laboratory for Fish and Crustacean Diseases,³ it is not possible to detect HPR-deleted ISAV by clinical inspection.

Commission Delegated Regulation (EU) 2020/990⁴ considers that clinical signs of disease are less obvious in certain categories of aquaculture animals than others and that it is an inappropriate use of resources to require clinical inspection of such animals in advance of every movement from an aquaculture establishment.

Article 12 of Delegated Regulation (EU) 2020/990 introduces a derogation from the animal health certificate requirement by which operators may move aquaculture animals of listed species relevant for category C diseases without an animal health certificate subject to compliance with the following conditions:

- a) The competent authority of the Member State of destination has notified the Commission and the other Member States that such movements are authorised, subject to compliance with the conditions laid down in points (c) and (d).

¹ European Commission's reply to the AAC Recommendation on Animal Health Law, 2025, <https://aac-europe.org/wp-content/uploads/2025/07/Reply-to-AAC-Rec-Animal-Health-Law.pdf>

² AAC Recommendation on Animal Health Law, 2025, <https://aac-europe.org/wp-content/uploads/2025/05/2-AAC-Recommendation-on-Animal-Health-Law.pdf>

³ 'Note concerning the susceptibility of rainbow trout and brown trout to infection with HPR-deleted ISAV', EU Reference Laboratory for Fish and Crustacean Diseases, 10 December 2021.

⁴ 'Animal health and certification requirements for movements within the Union of aquatic animals and products of animal origin from aquatic animals', Commission Delegated Regulation 2020/990, 28 April 2020.

- b) The competent authority of the Member State of origin has authorised the movement.
- c) The category C disease in question has never occurred in either the Member State of origin or the Member State of destination.
- d) Both the competent authority of the Member State of origin and of destination have systems in place to ensure the traceability of the aquaculture animals moved in accordance with the conditions laid down in points (a), (b) and (c).

II. Justification

The AAC reiterates the need to amend Article 12 based on four reasons:

- 1. It is an inappropriate use of resources to require clinical inspection of rainbow trout and brown trout to detect HPR-deleted ISAV, as the disease shows no disease symptoms under farm conditions.
- 2. All Member States are declared free of HPR-deleted ISAV, and the disease has never been reported.
- 3. The competent authority in Germany has rejected subsequent requests from the competent Danish authority to activate Article 12 on movements of rainbow trout related to HPR-deleted ISAV.
- 4. Article 12 has never been used by any Member State.

The current inappropriate use of resources is illustrated by the situation in Denmark.

The competent Danish authority annually issues about 7,000 aquaculture certificates based on about 2,700 clinical inspections related to movements of rainbow trout within the Union.

The cost of issuing a certificate is about 109 EUR. The cost of clinical inspection includes a basic fee of about 92 EUR and about 83 EUR for every 15 minutes of inspection time. Assuming 30 minutes per clinical inspection, the total annual costs are estimated at about 1.5 million EUR.

Whereas all receiving establishments are declared free of HPR-deleted ISAV, it is estimated that no more than 5% are also declared free of the listed diseases VHS and/or IHN (which can be detected by clinical inspection).

Consequently, at least 95% of the annual costs (around 1.4 million EUR) are related to HPR-deleted ISAV.



III. Recommendations

AAC recommendation:

To the European Commission

1. Amend Article 12 of Commission Delegated Regulation (EU) 2020/990 as follows:
 - Delete point (a), as Member States are not willing to use it.
 - Delete point (d), as movements of aquatic animals from one Member State to another are notified in TRACES.
 - In point (c) replace 'the category C disease in question' with 'HPR-deleted ISAV'.



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