



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE.A.2/BVT

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

Dear Mr Brian Thomsen,

I would like to thank you for your mail of 5th January 2026 including the “*Recommendation on HPR-deleted infectious salmon anaemia virus (HPR-deleted ISAV)*”, as a follow-up to the Commission’s reply from 28th May 2025 on the AAC Recommendation on the Animal Health Law.

In this Recommendation, the Aquaculture Advisory Council asks the European Commission to:

- *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’.*

As background, I would like to draw your attention to the fact that Article 12 of Delegated Regulation (EU) 2020/990 ⁽¹⁾ was introduced in the frame of the Animal Health Law (Regulation (EU) 2016/429 ⁽²⁾) as an innovative tool to provide flexibility to allow Member States to derogate from the general requirement of animal health certification in certain situations. It was never the intention of the Commission to make this possible voluntary derogation, a prescription (compulsory).

⁽¹⁾ [Delegated regulation - 2020/990 - EN - EUR-Lex](#)

⁽²⁾ [EUR-Lex - 02016R0429-20191214 - EN - EUR-Lex](#)

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In addition, I would like to provide some specific comments to each of your recommendations for redrafting Article 12:

- Point (a) is essential for transparency purposes. If a Member State of destination makes use of the derogation from the animal health certificate, it is necessary that the use of the derogation is notified to other Member States and the Commission. If this notification did not exist, the Member State of origin would not be aware of the derogation and will continue issuing animal health certificates.
- As regards the amendment to point (c): the Commission's intention is to keep it general as it is, to allow the use of the derogations provided in this Article in relation to other Category C diseases.
- As regards the amendment to point (d), the Commission would rather insist on the importance of having systems in place to ensure the traceability of the animals that are not limited to TRACES and must apply even in situations when TRACES is not used (i.e. national movements).

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 (MARE-AC@ec.europa.eu ; +32.2.296.88.89), who will forward them to relevant colleagues.

Yours sincerely,

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