



AAC Recommendation for a uniform and long-term solution in case of an outbreak of ISA/IHN/VHS

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I. Background

Legislative Framework for VHS and IHN in Salmonids

Under the Animal Health Law (AHL, Regulation (EU) 2016/429)¹, the legislative framework for viral haemorrhagic septicaemia (VHS) and infectious haematopoietic necrosis (IHN) has undergone a radical shift compared to the old Directive 2006/88/EC². Today, both VHS and IHN are classified as “category C” diseases under Implementing Regulation (EU) 2018/1882³.

Category C defines diseases that are relevant only to certain Member States and for which control measures are necessary to prevent their spread into zones or compartments that are officially disease-free or have active eradication programmes. The primary target species are rainbow trout (*Oncorhynchus mykiss*), brown/marble (*Salmo trutta/marmoratus*), Atlantic salmon (*Salmo salar*), and other salmonids. The regulation’s objective is to protect disease-free areas and manage biosecurity during movements, preventing trade or the transfer of biological material (live fish, eggs) from spreading the pathogens.

Delegated Regulation (EU) 2020/689⁴ establishes the strict criteria for obtaining, maintaining, or suspending disease-free status for VHS and IHN at the level of an entire Member State, zone, or individual compartment. Member States or individual regions that are not disease-free may implement eradication programmes.

The development of this recommendation requires particular attention to a number of key provisions of Regulation (EU) 2016/429, together with issues related to their implementation and their interplay with other relevant EU regulatory frameworks:

- **Flexible Control Measures (Article 9):** the application of measures against listed diseases can vary significantly based on the decisions of individual Member States.
- **Health Visits and Monitoring (Articles 25-27):** provision is made for veterinary health visits based on the risk of disease introduction or spread within an establishment. Furthermore, surveillance obligations are imposed on competent authorities; these must be “proportionate” to the objectives, leaving room for discretion.
- **Approval of Establishments and Derogations (Article 176):** the AHL Regulation requires the approval of aquaculture establishments but allows Member States to exempt small-scale local production operations or recreational fishing ponds, provided they do not present a significant risk.
- **Abnormal Mortality and Movements (Articles 196, 199):** it is prohibited to move animals that show symptoms or originate from sites experiencing abnormal mortality of unknown cause. The competent authority may grant derogations only on the basis of a risk assessment and if the animals come from independent epidemiological units.

¹ <https://eur-lex.europa.eu/eli/reg/2016/429/oj/eng>

² <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006L0088>

³ https://eur-lex.europa.eu/eli/reg_impl/2018/1882/oj/eng

⁴ https://eur-lex.europa.eu/eli/reg_del/2020/689/oj/eng

Member States may also prohibit releases into the wild if the animals do not come from declared disease-free zones.

- **To move susceptible salmonids into disease-free zones or compartments (or those subject to eradication programmes), the regulation imposes requirements as the Official Animal Health Certification (Articles 208–209 of the AHL):** consignments must be accompanied by an official certificate attesting that they originate from a disease-free site.
- **For commercial flows between areas with the same health status (where an official certificate is not required), a self-declaration document completed by the operator of origin remains mandatory to ensure full traceability (Article 218).**

A key point of friction in the implementation of the AHL for VHS and IHN is the need to reconcile its disease control requirements with the objectives of the Water Framework Directive (2000/60/EC)⁵, notably the restoration of river continuity and the management of restocking activities. Further complexity stems from the derogations allowed under Article 176 for small-scale aquaculture facilities and recreational fishing operations, including in public waters⁶.

II. Justification

The management of fish farms varies considerably depending on the environment, water source, fish developmental stage, reared species, and facility structure—ranging from earthen carp ponds covering several hectares and concrete raceways for salmonids to recirculating aquaculture systems (RAS).

High transmission risks arise from the movement of infected fish by both aquaculture facilities and restocking organisations, as well as from the lack of veterinary control in recreational ponds located along rivers upstream from other production facilities. Consequently, several sectors of European aquaculture suffer heavy economic impacts from viruses such as VHS, IHN, and infectious salmon anemia (ISA).

Strict EU eradication mandates for viral diseases like IHN and VHS severely hinder trout farming and create immense economic risks. These rigid regulations prevent the development of disease-resistant fish strains and block the use of vaccines. Furthermore, eradication is highly impractical in many regions because farms rely on public waters that naturally harbour disease vectors. Consequently, the industry urgently needs to shift toward practical, long-term management solutions to ensure its economic viability.

⁵ <https://eur-lex.europa.eu/eli/dir/2000/60/oj/eng>

⁶ Implementing the Animal Health Law (AHL) for VHS and IHN presents a major challenge: balancing strict disease control measures with the environmental goals of the Water Framework Directive (2000/60/EC). Specifically, it is difficult to align disease prevention with efforts to restore natural river flows and manage fish restocking. The situation is further complicated by Article 176, which grants special exemptions for small-scale aquaculture farms and recreational fishing activities, including those in public waters.

Key Challenges in Disease Diagnostics and Eradication

- **Timely Diagnosis and Notification:** promptly diagnosing and reporting outbreaks of listed diseases are essential factors in combating their spread.
- **Limitations of Clinical Screening:** clinical examination of contaminated batches is insufficient to determine their epidemiological status. There is currently a critical shortage of practical, rapid testing methods that can be applied directly on-site at the farm.
- **Eradication Program Failures:** viral disease eradication programmes (for VHS and IHN) have proven ineffective in nearly all EU countries. This failure is due to the complex, interconnected nature of river basins and a lack of funding to compensate fish farms for their losses.
- Even where total eradication is unlikely, the impact of viral diseases can be significantly reduced to a marginal level, as demonstrated by successful initiatives in several regions, compartments, and Member States.

Furthermore, field experience shows that the effectiveness of eradication programmes is strictly tied to the availability of **adequate financial compensation** for sanitary fallowing or complete depopulation. Without compensation, there is a severe risk that operators will keep allow active infections to persist, thereby damaging downstream facilities along the same waterway.

Because these viruses are primarily transmitted horizontally through water and via asymptomatic carriers, the decision by some Member States to exempt recreational fishing ponds or small, non-isolated commercial facilities from mandatory veterinary approval poses a serious pathogen threat. With river basins becoming increasingly interconnected, the lack of effective control over water installations linked to natural water bodies risks undermining the biosecurity efforts and health monitoring implemented by professional aquaculture sectors.

In regions and countries where eradication programmes cannot be implemented, long-term solutions should be supported, in particular genetic selection of fish for increased resistance to VHS and IHN, and the introduction of vaccines against VHS and IHN as soon as possible.

Restocking Regulations in Public Waters

Conversely, the spread of pathogens through public waters has been successfully reduced in some Member States thanks to restrictive measures regarding salmonid release:

- Salmonids and all other species susceptible to infectious hematopoietic necrosis (IHN) and viral hemorrhagic septicemia (VHS) may be released for restocking purposes only if they originate from a zone or compartment declared disease-free.
- Salmonids and all other susceptible species may be released into recreational fishing ponds directly connected to local water basins **only if they are clinically healthy and originate from a farm or zone with a health status at least equivalent** to that of the



receiving waters, and where no unexplained increase in mortality rates has been recorded.

Several considerations have emerged since the Animal Health Law came into effect. Currently, the implementation of the AHL remains uneven across Member States; in some countries, fish farmers who wish to adopt voluntary health monitoring have received little to no incentive to do so. Furthermore, the detection and reporting of notifiable diseases have revealed noticeable inconsistencies. This is evident when comparing the data published on the World Animal Health Information System (WAHIS) platform—the global reference database managed by the World Organisation for Animal Health (WOAH)—with the official reports issued by the EU Reference Laboratory (EURL).

Taken together, this information points to a worrying trend: virus circulation within the EU has actually increased since Regulation (EU) 2016/429 came into force. Consequently, there is an urgent need for stricter regulations regarding disease outbreaks and a significant reduction in the movement of contaminated fish. Taking these steps is vital to lowering the prevalence of viruses in both natural waterways and aquaculture facilities.

III. Recommendations

AAC Recommendations:

To the European Commission

1. Regulatory Assessment and Harmonization

- Evaluate the current state of implementation of Regulation (EU) 2016/429 (Animal Health Law) and its corresponding delegated acts (DAs) and implementing acts (IAs) to identify operational bottlenecks and major discrepancies in application across Member States.
- Recognize small recreational ponds as posing a potentially high disease risk under the AHL. Encourage Member States to implement rules requiring the registration of recreational ponds.
- Evaluate how the different Member States reconcile their disease control requirements with the objectives of the Water Framework Directive (2000/60/EC), notably the restoration of river continuity and the management of restocking activities, i.e. how the restoration of river continuity takes the disease control requirements into account.

2. Surveillance, Risk Management, and Eradication

- Assist Member States in effectively implementing active surveillance frameworks where required. This includes conducting mandatory virological screening at risk-based intervals, tailored to the specific epidemiological situation of each Member State, for notifiable diseases in salmonid farms and other aquaculture facilities acting as potential vectors for listed diseases.



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- Develop and issue updated guidelines to standardise and improve the risk-based classification of aquaculture establishments.
- Encourage competent authorities to adopt optional eradication programmes backed by robust financial compensation frameworks to cover the operational losses incurred by fish farmers.
- Promote and facilitate the allocation of financial support for disease eradication efforts through the European Maritime, Fisheries and Aquaculture Fund (EMFAF).

3. Innovation, Biosecurity, and Information Sharing

- Boost investment and cooperation at all levels—particularly by incentivising scientific research—to counter the spread of viral fish diseases, enhance the fish immune system, develop targeted vaccines, and pioneer rapid, on-farm virological testing methods.
- Mandate equivalent provisions and biosecurity standards for all live fish and aquaculture products imported from third countries to protect the EU market.
- Facilitate seamless information exchange and epidemiological data collection among National Reference Laboratories (NRLs), ensuring that these insights are actively disseminated to industry stakeholders as well.

To the Member States

- Invest in and support targeted research into rapid, practical virological testing methods that can be deployed directly on-site at the farm level. Maintain absolute rigor and transparency by requiring the immediate reporting of all disease outbreaks on a dedicated digital platform accessible to sector professionals.
- Leverage EU and national funding to subsidise farmers' VHS and IHN vaccination costs and to back research centres dedicated to developing disease-resistant fish strains.
- Assist competent authorities in fully implementing active surveillance frameworks where required. This includes enforcing mandatory virological screening at risk-based intervals, tailored to the specific epidemiological situation of each establishment, compartment, or zone, for notifiable diseases in salmonid farms and other aquaculture facilities acting as potential vectors for listed diseases.
- Mandate strict biosecurity measures across aquaculture facilities rearing salmonids and other live fish species that are potential vectors for listed diseases. This must include rigid compliance rules that restrict live fish movements exclusively between establishments of equal health status or from higher-status to lower-status facilities.
- Where and when logistically feasible, suspend the movement of live salmonids from confirmed positive sites until full disease eradication and certified



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disinfection are achieved using approved methods, allowing exceptions only for direct transport to processing plants.

- Encourage competent authorities to adopt optional disease eradication programmes backed by robust financial compensation frameworks to cover operational losses, while actively promoting the allocation of funding through the European Maritime, Fisheries and Aquaculture Fund (EMFAF).
- Implement restrictive regulations governing the introduction of fish species susceptible to specific pathogens into open waters for both restocking purposes and recreational/sport fishing.
- Strictly prohibit any restocking activities using salmonids or other potential vector species unless accompanied by a recent animal health certificate proving they originate from officially disease-free facilities or farms under active voluntary surveillance.



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