COMMENTS OF AFRICAN UNION _ AQUATIC ANIMALS HEALTH COMMISSION REPORT 2018

STANDARD	ANNEX	CHAPTER and ARTICLE	PROPOSED CHANGES (POSITION)	RATIONALE
Glossary	3	Basic Biosecurity conditions (a) and (b) an *early detection system* ~~is in place within the *zone* or country~~; and *b)* compulsory notification of the observed or suspected *disease*~~,~~ ~~including or suspicion of the *disease*,~~ ~~is compulsorily notifiable~~ to the *Competent Authority*; and	AU proposes swapping a) and b) as indicated. AU proposes rephrasing (b) as suspicion of disease was premised on its compulsory notification.	Logical sequence should start with early detection system, followed by its notification to the CA To improve readability and clarity.
Criteria for listing species as susceptible to infection with a specific pathogenic agent	4B	CHAPTER 1.5. Article 1.5.4 3) invasive experimental procedure; includes injection, exposure of the susceptible host animal to high loads of *pathogenic agent*, and/or exposure to stressors (e.g. temperature) not encountered in the host's natural or culture environment.	AU proposes editing the sentence as indicated	For clarity
Criteria for listing species as susceptible to infection with a specific pathogenic agent	4B	Article 1.5.6 B. viable *pathogenic agent* is isolated from the proposed *susceptible species*, or infectivity is demonstrated by way of transmission to ~~naïve~~ apparently healthy individuals;	AU proposes to replace 'naïve' with "apparently healthy"	for clarity

Acute Hepatopancreatic Necrosis Disease	9	Ch 9.1 Article 9.1.1. For the purposes of the *Aquatic Code*, (AHPND) means *infection* with strains of *Vibrio parahaemolyticus (Vp$_{AHPND}$)*, of the Family Vibrionaceae,	Because of this definition, AU proposes that all reference to AHPND throughout the chapter be changed to *Vp$_{AHPND}$*.	For consistency
Acute Hepatopancreatic Necrosis Disease	9	Article 9.1.12. Importation (or transit) of aquatic animal frozen products for retail trade for human consumption regardless of the ~~AHPND~~ *Vp$_{AHPND}$* status of the exporting country, zone or compartment	Insert “frozen” between ‘aquatic animal’ and ‘products’	Need to be specific
Biosecurity	12	Ch 4.X Article 4.X.6 1. Aquatic Animals *b)* Quarantining and testing introduced *aquatic animals* of unknown *disease* status from other farm populations in separate production units or dedicated *quarantine* facilities. ~~*f)*~~ *c)* Isolating *aquatic animal* populations that display clinical signs of *disease* from other populations until the cause is known and the situation is resolved. ~~*c*~~ *d)* Where appropriate, treatment of quarantined *aquatic animals* to mitigate *disease risks* (for example, for external parasites). ~~*d*~~ *e)* Ensuring biosecure transport of *aquatic animals* that avoids exposure to *pathogenic agents.* ~~*e*~~ *f)* Only moving *aquatic animals* between different populations within the establishment following consideration of	Should include testing the animals for infection. Positive cases to proceed to be isolated and treated. Bring f) to c) and renumber the subsequent points	For clarity, to explain what happens during quarantine Logical sequence

		the *disease risks* and with a view to maintaining high health status of *aquatic animal* population.		
Biosecurity	12	Article 4.X.6 2. Aquatic animal products and waste *a)* determining the potential *disease risk* of aquatic animal products and waste to the establishment and the environment; *b)* isolating areas within the *aquaculture establishment* where *aquatic animal products* and waste are managed from *aquatic animal* populations to minimise identified disease transmission *risks*; *c)* ensuring systems are implemented for appropriate collection, treatment (inactivating *pathogenic agents*), transport, storage or disposal of *aquatic animal products* and waste to minimise the *risks* of transmitting *pathogenic agents*.	AU raises the question "How can this be done in already established systems?"	AU proposes that the standards should specify that the CA must institute and implement obligatory regulations for this, especially in the 3rd world where basic biosecurity conditions are lacking.
Biosecurity	12	4. Feed *Feed* can be an important pathway for transmission of *pathogenic agents*, pollutants and other stressors to *aquatic animals*.	Insert 'pollutants and other stressors'	Feed can also be contaminated by organic and inorganic pollutants and other stressors, not just pathogenic agents.
Biosecurity	12	6. Vectors These include wild *aquatic animals* entering via the water supply such as snails, zooplankton, escapees, predators, wild birds, and pest animals such as rodents.	AU suggests inserting 'such as snails, zooplankton, escapees'	Although the Code includes intermediate hosts in the definition of *vector*, there is need for clarity especially for snails and zooplankton

				as intermediate hosts of helminth parasites. AU proposes 'escapees' here to give clarity where some infected fish escape from the establishment and potentially infect the next establishment or to the wild.
Biosecurity	12	Article 4.X.8 1. Development of a biosecurity plan and key components of a biosecurity plan The process to develop a *biosecurity plan* will vary depending on its objectives ~~of the *biosecurity plan*,~~ the level of *biosecurity* appropriate to the specific production system requirements, the complexity of the *disease risks* to be addressed, and availability of information and resources.	AU suggests combining 1 and 2 as detailed below AU suggests editing this sentence as indicated	Edited for clarity, conciseness and to remove repetition
		Article 4.X.8 *d)* a *risk analysis*, including identification of the major *disease hazards* to the *aquaculture establishment* (refer to Article X.X.7. above)~~,~~ and the mitigation measures that have been determined to address identified *risks*; ~~*e) the mitigation measures that have been determined to address identified risks*;~~	AU suggests removing (e) and merging it with (d)	Risk mitigation is part of the risk analysis process

		~~*f)* emergency procedures in the event of a *biosecurity* failure;~~ ~~*g*~~ *e)* standard operating procedures required to support implementation of the mitigation measures, emergency procedures and the training requirements of personnel (SOPs) SOPs describe routine management processes which must be performed to support the effectiveness of the *biosecurity plan*. Each SOP should clearly describe its objectives, staff responsibilities, the procedure (including record keeping), precautions and a review date. Staff should be trained in the application of the SOPs including completion of forms, checklists and other records associated with each procedure, as well as routine communication requirements.; ~~*h*~~ *f)* internal and external communication procedures, and roles and responsibilities of personnel; The *biosecurity plan* describes documentation necessary to provide evidence of compliance with the mitigation measures. The level of detail required in the documentation depends on the outcomes of the transmission pathway assessment. Examples of documentation required may include: *aquaculture establishment* layout, movements of *aquatic animals*, escapees, origin and health status of	Move (f) towards the end of the list	Logical sequence

		the *aquatic animals* introduced to the *aquaculture establishment*, stocking densities, feeding and growth rates, records of staff training, treatments/vaccination, water quality, morbidity and mortality, *surveillance* and laboratory records. ~~f~~ *g)* monitoring and audit schedule; The *biosecurity plan* should describe a systematic auditing schedule to verify implementation and compliance with the requirements of the *biosecurity plan*. Routine revision of the *biosecurity plan* is necessary to ensure it continues to effectively address *biosecurity risks*. The *biosecurity plan* should also be reviewed in response to changes to the *aquaculture establishment* operations, changes to husbandry approaches, identification of a new *disease risk*, or the occurrence of a *biosecurity* incident. *Biosecurity* incidents, and actions taken to remedy them, should be documented to enable SOP re-assessment. ~~f~~ h) Health monitoring Health monitoring as part of the *biosecurity plan* involves monitoring of the health status of *aquatic animals* in *aquaculture establishments*. Activities may include *disease surveillance*, routine monitoring of stock for important health and production parameters, recording of clinical signs of *disease*, morbidity and mortality, and analysis of		

		these data (e.g. calculation of mortality and diseases). ~~k~~ *j)* emergency procedures in the event of a *biosecurity* failure; Procedures should be developed and, when necessary, implemented to minimise the impact of emergencies, *disease* events, or unexplained mortality in *aquatic animals*. These procedures should include clearly defined thresholds that help to identify an emergency incident and activate response protocols, including reporting requirements. ~~l~~ *j)* performance evaluation. ~~2. Key components of a biosecurity plan~~	AU proposes to move emergency procedures to (j) AU proposes to remove this whole section and fit it under appropriate section in 1 above	Emergency procedures should logically come last, when all the other measures have failed. To avoid unnecessary duplication
Pathways for claiming freedom from disease in the OIE *Aquatic Animal Health Code*	13	**3. Analysis of existing pathways for claiming freedom** 4. Previously made a self-declaration of freedom ~~free~~ but lost their free status due to a detection.	AU suggest removing ‘free’	Grammar

African Union's responses to questions in Table 3. Summary of discussion points for comment by Member Countries. Refer to relevant sections of the document for additional context.

Section 3.1. Pathway 1. Absence of susceptible species	**Response**	**Rationale**
1. Is Pathway 1 likely to be used by Member Countries?	No	
2. What is an appropriate standard of evidence that susceptible species are absent from a country?	By active and passive surveillance	
Section 3.2. Pathway 2. Historical freedom		
3. Are the proposed requirements for passive surveillance in farmed and wild aquatic animals appropriate?	NA	
4. Should historic freedom require that the disease has never been detected (as proposed) or is a period of freedom (e.g. ten years) sufficient?	NA	
5. Are the factors for determining the required period of basic biosecurity conditions for listed diseases appropriate?	NA	
Section 3.3. Pathway 3. Unknown disease status		
6. Are the proposed criteria for determining the periods for basic biosecurity conditions for this pathway appropriate?	OK	

7. Is one year an appropriate minimum period for *basic biosecurity conditions* to be in place prior to the commencement of active surveillance for declaring freedom for countries or zones?	Agreed	
8. Is one survey per year (at least three months apart) for two years an appropriate default requirement?	At least 2 surveys per year to take account of the 2 production cycles	AU proposes 2 years of active surveillance to declare freedom from a disease – to take account of temporal changes, production cycles and the intensity of the infection.
Section 3.4. Pathway 4. Returning to freedom		
9. Should countries and zones be able to return to freedom more quickly following an eradication programme than in an initial *self-declaration of freedom* for a country or zone (if appropriate criteria are met)?	Yes	
10. Should compartments be able to regain freedom immediately after destocking and successful decontamination (i.e. with surveillance at the level required to maintain freedom) if *basic biosecurity conditions* have been reviewed and modified and restocking is with disease free animals (e.g. from a free country, zone or compartment)?	Yes, but after destocking and decontamination for a prolonged period	
11. When should the starting time point be for surveillance – e.g. commencement of sampling or at the conclusion of sampling for the first survey with negative results?	Immediately after detection; but second surveillance requires a longer period > 3 months	
12. Should Chapter 1.4. provide clearer guidance on establishing infected and protection zones (perhaps in the proposed new chapter on emergency response) and sampling within them (for farmed and wild animals)?	Yes	
Section 4. Maintaining freedom		
13. Do Member Countries require additional guidance on what constitute 'conditions conducive to clinical expression'?	NA	

14. Do Member Countries require additional guidance on how to evaluate or test their 'early detection system'?	NA	
Section 6. Requirements for making a self-declaration of freedom		
15. Is the OIE procedure for the publication of a self-declaration of freedom sufficient guidance for Member Countries for making self-declarations of freedom? If not, should a separate chapter be provided within the *Aquatic Code*?	It is sufficient but needs more clarity No	