



Overview of public feed back on draft delegated regulation on surveillance, eradication, disease-free status

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Consultation from 05.06.19 to 03.07.19

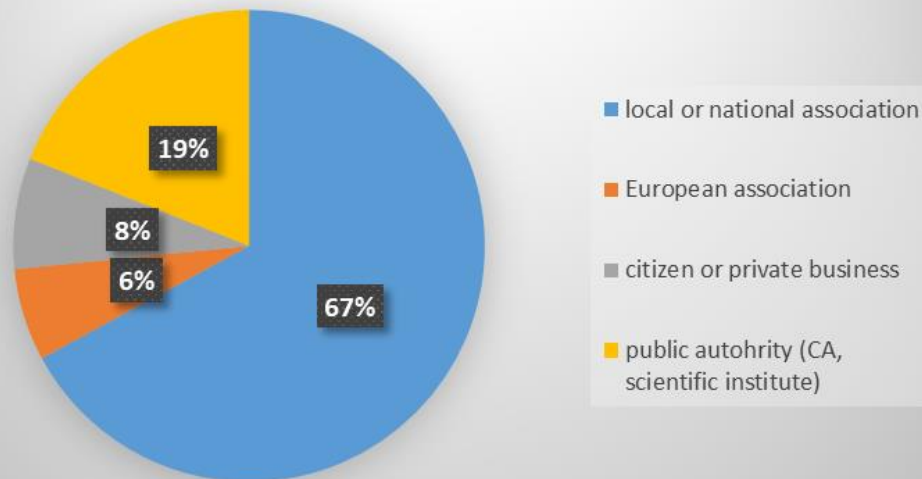
Public feedback on surveillance, eradication, disease-free status

79 feedback received → 51 different points raised

- Some comments related to misunderstanding of existing legislation or linked to the AHL or to other DAs
- Some mistakes pointed out → correction
- A few main concerns, often repeated by many stakeholders, and raised during expert group meetings → following slides

Origin	Count
FR	39
UK	16
IE	6
European associations	4
NL	4
DE	2
NO	2
AU	1
BE	1
DK	1
ES	1
IT	1
SE	1
Total	79

Distribution per category



General points

- **Concerns raised in 2 MS, supported by 1 EU association about too prescriptive approach for category C diseases**
→ **Approved programmes are linked to movement rules within the EU so harmonisation ensures an equal level playing field**
- **Request from 1 MS that disease-free status and eradication programmes already approved continue to conform to the existing legislation**
→ **Legal uncertainty and practical difficulties, i.e. parallel regimes in different zones of the same MS**

Infection with *M. tuberculosis* complex

- **Concern raised in 2 MS, supported by 2 EU associations about stringent rules for introduction of animals and long procedure to regain free status**
 - *Main rules aligned with the OIE + derogations*
 - *Derogation for introduction based on the situation of the area not the establishment*
 - *Derogation for quick regaining of status following recent infection – CA may order additional test or stamping out*
- **Concern raised by 1 EU association about testing ruminants in case of TB in wild animals if the CA take no action to control TB in wild animals**
 - *Expert group meeting concluded that inclusion of wild animals should be left to assessment of the CA*
- **Concern raised by 1 EU association that TB free status is not absence of TB**
 - *Aligned with the OIE – recently supported by EU*

Infection with Bluetongue virus

- Concern raised in 3 MS, supported by 2 EU associations on the unloading animals travelling through BTV zone under eradication programme or free, outside a vector protected establishment
 - *Status quo - no evidence it caused spread of the disease*
- Concern raised in 1 MS supported by 1 EU association on the possibility to take into account the situation in the MS of origin when granting derogation for movement
 - *Equal opportunities for all MS having the same conditions*
- Concern from 1 MS about strict conditions to gain status
 - *Necessity for increased surveillance stressed by EFSA*
- Request raised in 1 MS, supported by 1 EU association, to eradicate/ grant status for each serotype of BTV
 - *Aligned with the OIE + more complicated*

Infectious bovine rhinotracheitis

- **Concern raised in 2 MS, supported by 1 EU association, as regards requirements for granting the disease-free status :**
 - **diagnostic methods (pooling of samples, use of gE ELISA on bulk milk, reference to weak positive sample),**
 - **vaccination ban for 2 years**
 - **proposed alternative sampling schemes (e. g. suckler herds) based on less frequent testing**

→ Requirements for diagnostic are based on OIE manual and OIE reference laboratory

→ Result of expert group meetings: 2 year vaccination ban at establishment level, not at MS/zone level

→ Testing regimes have to provide the same level of safety

Bovine viral diarrhoea

- **Concern raised in 1 MS, supported by 1 EU association, as regards the requirements for introduction of animals into free establishments and the pooling of samples for granting the disease-free status**
 - *The requirements for introduction reflect the low frequency of serological testing to maintain the disease-free status*
 - *The OIE manual contains no recommendations regarding the pooling of samples, validation is up to the NRLs*
- **Concern raised in 1 MS as regards the period without confirmed case before granting the disease-free status (12m vs. 18m) and the test requirements for introducing dams of Ag-negative calves into free establishments**
 - *longer period considered safer, expert's compromise*
 - *Uncertainty regarding correct matching of calves and dams from different establishments from other MSs/zones*
- **Concern raised in 2 MS as regards the vaccination ban**
 - *Result of expert group meetings*

