



Bsal: state of play and possible way ahead

PAFF meeting 15 September 2022

Section AHW, Agenda point A.05

Legal framework

- Bsal listed in Annex II of AHL (CDR (EU) 2018/1629)
- Bsal is a Category D disease by CIR (EU) 2018/1882
- Bsal is notifiable by Article 3 of CIR (EU) 2020/2002
- Bsal is covered by emergency measures in CID (EU) 2021/361 until end of 2022
 - Intra-EU: quarantine and test/treatment *before* departure, derogation for confined
 - Entry: quarantine and test/treatment *after* entry
 - Burdensome, cumbersome, both on CA and on operators
 - Reporting obligation (re. on consignments each year by 30 June)

Caudata movements in TRACES

Intra-EU:

Year	Number of consignments	Number of animals	MS of origin	MS of destination	Comment
2021	19	624	CZ, CY, DE	AT, BE, CZ, DE, FR, NL,	Size of consignments vary
2022	18	446	CZ, DE, LV, NL,	BE, CY, DE, EE, ES, FI, NL, SE,	Size of consignments vary

Entry into the EU:

Year	Number of consignments	Number of animals	TC of origin	MS of destination	Comment
2021	2	76	Singapore, UK	EL, IE	
2022	10	700	Singapore, UK	IE, LV	UK-IE: 9 times same origin, same destination

Official information

- Bsal not notified by any MS in ADIS
- Bsal not reported by any MS in ADIS
- No report by any MS under CIR (EU) 2021/361, implying:
 - no Bsal was found during the tests in quarantines (i.e. before intra-EU movement or after entry into the Union)
 - No treatment was used without testing
 - No experience was worth sharing
- No other official correspondence received
- Anything missed?

New scientific information

- Source: <http://bsaleurope.com/scientific-publications/>
- Several MS did some surveillance and indicated absence of Bsal (e.g. PL, EE, LV)
- New diagnostic possibilities (e.g. from water bath, sentinels etc.)
- New pathways (e.g. wild caudata walking, aquatic plants, frogs, etc.)
- Longer presence in the EU than thought and more diverse genetic structure
- New insights (e.g. differences in virulence, benefits of previous infection, etc.)
- Possibly spontaneous disappearance and/or recovery and/or tolerance
- New treatments
- ...

Other information

- From stakeholders:
 - Promotion and exercise of good practices, self-restriction in trade
 - Closed populations, free offsprings need to be allowed to be traded
- From leading Bsal scientists:
 - Bsal persists, range is slowly expanding, threat to urodelan hotspots
 - Fire salamanders, great crested newts are most sensitive
 - Experience in Spain: actions can contain and/or eradicate from infected site
 - Marker for host susceptibility
 - More surveillance in the EU, more early warning and more local mitigation is needed

Emergency measures + normal measures

Emergency measures: AHL Article 257-261

- Art 257: MS: „event of an outbreak”, „serious risk”, „gravity of the situation”
- Art 258: other MS: „where it detects on its territory animals...”
- Art 259: „Commission shall review the situation and the emergency measures taken...”
- Art 260: „MS... take one of more of the following emergency measures...”
- Art 261: „Commission... adopt one or more of the following emergency measures...”

Normal measures: AHL Art 227 on „other animals”:

- „may” empowerment for delegated and implementing rules

Regulatory challenge(s)

Complex and not clear situation

- Key mitigation step: no transfer of kept salamanders to wild habitats
- Demography and sociology of salamander keepers, overlap with pet keepers
- Questions on nature of Bsal, on infection pathways, on mitigation possibilities
- No trade losses or disputes caused by Bsal itself
- Various other problems of implementation:
 - E.g. accreditation of official labs, etc.

Suggestions for the MS

Most appropriate actions to address the disease seem to be:

- Local prevention of transfer of kept, infected salamanders to wild habitats
 - especially in hotspots and/or where fire salamanders live
- Local surveillance (both in wild and in kept animals) followed by notifications in ADIS
- Local awareness and information actions
- Local risk mitigation actions
- Local cooperation with environmental authorities, NGOs, citizens and stakeholders
- Local official controls of incoming consignments (both from intra-EU trade and entry into the Union)

Further steps (at EU level)

- DG SANTE remains open to consider further official data from the MS
- EFSA might be needed to evaluate new information
- Our priority: proportional and sustainable rules respecting subsidiarity
- Longer timeframe is needed for delegated and implementing acts
 - Expert group meetings and consultations with all concerned
- Limited resources define our priorities
 - Or de-regulation