Annex 8. Item 6.4. – Article 1.3.1. of Chapter 1.3. Diseases listed by WOAH

**USA COMMENTS IN RED FONT**

CHAPTER 1.3.

DISEASES LISTED BY WOAH

[…]

Article 1.3.1.

The following *diseases* of fish are *listed diseases*:

­– Infection with *Aphanomyces invadans* (epizootic ulcerative syndrome)

– Infection with epizootic haematopoietic necrosis virus

– Infection with *Gyrodactylus salaris*

– Infection with HPR-deleted or HPR0 infectious salmon anaemia virus

– Infection with infectious haematopoietic necrosis virus

– ~~Infection with~~~~all genogroups of the virus species~~ *~~infectious spleen and kidney necrosis virus~~*

– Infection with koi herpesvirus

– ~~Infection with red sea bream iridovirus~~ Infection with red sea bream iridovirus

– Infection with salmonid alphavirus

– Infection with spring viraemia of carp virus

– Infection with tilapia lake virus

– Infection with viral haemorrhagic septicaemia virus.

[…]

**RATIONALE:**

The United States appreciates the work conducted by the WOAH Aquatic Animal Health Standards Commission (AAHSC) regarding the assessment for listing of all genogroups of the virus species Infectious Spleen and Kidney Necrosis virus (ISKNV). However, as outlined in the joint statements provided prior to the February 2023 and the September 2023 meetings of the AAHSC, we do not support the listing of all genogroups of the virus species ISKNV in Chapter 1.3, for the reasons outlined in this joint statement.

Criterion No. 2. states that “At least one country may demonstrate country or zone freedom from the disease in susceptible aquatic animals, based on provisions of Chapter 1.4.” In the case of the ISKNV genogroup, research demonstrates this pathogen has global distribution (especially in the ornamental fish trade). Based on this evidence, cited below and previously provided in the February 2023 joint statement, we recognise that the ISKNV genogroup is largely ubiquitous. In combination with this, the nature and volume of ongoing international trade of ornamental species, and the substantial list of susceptible species for all genogroups of the virus outlined in the *ad hoc* Group report, it is highly probable the ISKNV genogroup is globally distributed. As a result, we question that any country could declare freedom from ALL three genogroups in ALL wild and farmed susceptible species present in the country.

We note that the Commission’s September 2023 report stated, a “Member indicated in a comment that they have a surveillance program in place for ISKNV species and are free of infection with ISKNV species in one of the susceptible species farmed.” However, it is our understanding that demonstration of country-level freedom must address all susceptible species within a country or zone to a given pathogen across applicable environments. The evidence provided by this comment as freedom for the ISKNV genogroup in one of the many potential susceptible species within a country, does not demonstrate country-level freedom per WOAH standards.

In addition to the above, we are also concerned about the significant impacts that listing of all genogroups of the virus species ISKNV will have on international trade, particularly for those Members with a large ornamental industry. We recognize that the impact on trade is not one of the criteria for listing, but we respectfully request the Commission also consider these implications on Members. There are significant challenges to establishing surveillance for ISKNV in the ornamental fish trade due to the vast number of species and logistics of their international movement, especially when the pathogen is globally distributed. Since the ISKNV genogroup affects both warm-water and cold-water fish species, from freshwater and saltwater environments, which are farmed and/or wild caught, the listing of all genogroups for the virus species ISKNV would impact the surveillance and international movement requirements for ornamental fish species vital to domestic and international production and trade globally.