USA COMMENTS IN RED FONT

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

CHAPTER 1.3.

DISEASES LISTED BY WOAH

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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~~~~theall genogroups of the virus species~~ *~~infectious spleen and kidney necrosis virus~~*

– Infection with koi herpesvirus

– ~~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 assessment for listing does not provide sufficient evidence for meeting criterion #2 as outlined in Chapter 1.2 of the Aquatic Code due to the demonstrated global distribution of the ISKNV genogroup across the continents of North America, South America, Asia, Oceania, Africa, and Europe across a wide variety of species.

In addition to its global distribution, we are concerned this listing will have significant impacts on international trade, particularly for those Members with a large ornamental industry. We recognize trade impacts are 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 already 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.

The assessment for listing did not identify any country or zone that was identified through a self-declaration of freedom for this disease. We recognise that a self-declaration is not required based on the criteria for listing outlined in Chapter 1.2. however, we are of the opinion that the listing of an aquatic animal disease by WOAH should require and be supported by a self-declaration by a Member at the level of country or zone. It is our view that a requirement for a self-declaration of freedom by a member provides the transparency needed to fulfill the criteria and aligns with the transparency initiates of WOAH.

With the adoption of the revised Chapter 1.4. Aquatic Animal disease surveillance, in 2022 and the provision of guidance to Members on self-declaration through the recently published template for self-declaration of aquatic animal health status, the necessary supports for Members to publish a self-declaration of freedom for this pathogenic agent are available. These supports are intended to encourage and support Members in publishing self-declarations of freedom for diseases like these. A self-declaration from a Member should be required to support the listing of diseases such as infection with the genogroups of virus species infectious spleen and kidney necrosis virus prior to listing.

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