



Fédération Européenne pour la Santé animale et la sécurité sanitaire (FESASS)

Europäische Vereinigung für Tiergesundheit und gesundheitliche Sicherheit

Brussels, 16 March 2009

Comments on Working document SANCO/4656/2009 rev. 1

To begin with, FESASS wants to thank the Commission for organizing the stakeholder meeting on bluetongue on March 10 and for the opportunity to comment on the above mentioned working document.

Please find hereafter our comments on the single chapters of the working document:

1. Introduction

In general, we fully approve the intention to make regulation 1266/2007 more consistent, comprehensive and proportionate. With regard to the severe economic consequences of the measures to control and eradicate the disease (which come on top of the losses due to the disease itself) we want to highlight in particular the proportionality.

2. BT in the EU

Comparing map 3 to map 2, a slight improvement of the epidemiological situation can be determined. This can be attributed to the higher level of natural immunity and to the big efforts made by vaccinating a lot of animals in the affected countries. The success of the mass vaccination campaign (which was mostly obligatory and aimed at eradication) could be emphasized more clearly.

3. Legal framework for Bluetongue control

We accept that changes to directive 2000/75 fall outside the scope of the document. Nevertheless, we repeat our position, that the directive must be overhauled and strongly encourage the Commission to give high priority to that revision.

4. Proposed amendments to the Regulation

4.1 Monitoring and surveillance

The intention to provide more alternatives for monitoring systems is supported. There remain, however, some questions:

We don't see from the document that alternative systems like the mentioned cross sectional surveys give the same level of security; a more precise description of the envisaged alternatives would be helpful to evaluate if these systems save money and if yes, how much, or if there will be a redistribution of costs. We understand that the alternative systems should be applied in the whole restricted zone, because it is not known beforehand in which parts there is virus circulation. We understand, too, that

the proposed approach might lead to diverse methodologies being applied in the different member states (based on a minimum standard).

4.2 Sharing/exchange of information

We tend to encourage the Commission to demand a sufficiently high level of performance when it comes to reporting. During the meeting we also discussed the difference of the “policy makers’ map” and the “epidemiological map”. As many stakeholders expressed a certain preference for the latter, it could be expedient to use the information already available in the EU-BTNET system for that purpose. Maybe that system deserves a higher level of awareness. It should be examined if stakeholders could get better access.

4.3 Movement restrictions

A. Vector proof establishments

We want to reiterate our concern about the disproportionate effect of movement restrictions, in particular to the trade with breeding animals. After a period with difficulties we finally achieved a situation where we can live with the current provisions regarding the protection against vectors. Any change in that sensible area must be carefully considered. While we fully understand the problems of the authorities with the current practice of the treatment with insecticides and the well-known shortcomings, we must insist on practicable solutions. We don't know exactly what the OIE had in mind, when it proposed the word “quarantine station”, but the alternative EU proposal “vector-proof establishment” looks just as well impossible to implement in practice. Of course everything depends on the exact definition and “vector-proof establishment” might to some extent be a stretchy notion, but in practice it seems impossible to us to get official approval for any stable currently in use for the export of animals. When Italy or Spain (?) as mentioned in the meeting, have a good concept, we would like to hear more about it.

Although the respective numbers in Annex III refer only to non-vaccinated animals and therefore the aggravation does not apply for most of the animals traded today, we still have to think about the possibility of the introduction of a new serotype. If we cannot protect the animals against a certain serotype the whole trade will be stopped (at least until the animals are protected by a vaccine, which might become available).

B. Lower risk areas

We fully support the clarification that the movement of semen, ova and embryos from a lower risk area to a free area should be facilitated as has been done for live animals with reg. 123/2009.

C. Trans-placental transmission

The Commission rightly states that so far there has only been evidence of trans-placental transmission in BTV-8 infected cattle and that the implications of the measures are rather severe compared to the actual risk. The application of the safeguard measures for all serotypes is therefore based on shaky ground. We would prefer to see more evidence before this is continued.

Although the question is for the moment not considered by the Commission for the recast, we repeat our demand to immediately allow the movement of PCR-negative animals up to a certain period of their gestation. Moreover, there is evidence available suggesting that the chance of fetal wastage or brain defects is becoming less severe the longer the gestation lasts (possibly due to the immune response which develops at mid-pregnancy) and that it is uncertain if congenitally infected

ruminants play any significant role in the natural epidemiology of BT. This could open up possibilities for moving PCR-negative animals after mid-pregnancy.

4.4 Vectors

A. Vector free period

Maybe the Commission could encourage Member states to discuss again the concept of seasonally free period. Of course, regional conditions must be taken into account, but farmers and traders find it difficult to understand why neighbouring countries show such a difference of the start of the seasonally free period (e. g. NL and B on Dec. 5, 2008, F on Jan 5, 2009, while D and L have no seasonally free period). Hopefully, the revision of the criteria based on the EFSA Opinions will lead to a more harmonized approach.

B. Protection of vectors at transit

We don't consider transit to contribute significantly to the transmission of BTV, hence we could live with the deletion of Article 9. We would appreciate to discuss with the Commission again, when it becomes clear which option has been chosen in order to explore the consequences and to deal with reservations against such a simplification.

Last but not least, we tend to call again for a quick deletion of Article 9a. We are of the opinion, that the rules laid down in regulation 1266/2007, Annex III provide enough safety for trade and that derogations as far reaching as laid down in art. 9a are not justified. The Commission should not wait until the general overhaul of the bluetongue legislation to tackle that issue.

Thanking the Commission again for the constructive exchange of views on March 10 we remain at your entire disposal to answer questions or provide additional information.
