BACKGROUND INFORMATION:

The United States Animal Health Association (USAHA) applauds the efforts of the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service for the proposed standards of the National List of Reportable Animal Diseases. Consistent and reliable reporting of listed and emerging pathogens is a critical component of national biosecurity, early detection, and rapid response. However, to be effective and equitable, all professionals conducting work in aquatic animal health must be held to the same standards; pertinent disease detections made in aquariums and research facilities must also be reported. While the risk from these environments may be lower by comparison, the impact of the detection is comparable. When a publication(s), scientific report(s), or lay information reveals any positive detection without prior notification to the USDA, trade and national health status may be negatively impacted. Further, we support that a detection(s) made in these settings must be confirmed by the USDA prior to publication.

RESOLUTION:

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service, Veterinary Services (VS) to implement the National List of Reportable Animal Diseases (NLRAD) and extend the reporting requirement to academic and corporate researchers and public and private aquariums who detect a NLRAD listed pathogen or an emerging pathogen that poses a serious threat to domestic aquaculture industry sectors or natural resources. All non-negative detections in research settings of a World Organization for Animal Health listed or emerging pathogen must be confirmed by USDA prior to publication. USAHA further encourages USDA, in collaboration with others, to develop a white paper for best professional practices of those working in the field of aquatic animal or aquaculture health.

INTERIM RESPONSE:

USDA,APHIS, VS appreciates the opportunity to respond and input from USAHA. APHIS will work to build relationships with aquatic animal health professionals, to ensure all relevant partners are included in the NLRAD reporting requirements. As the proposed rule progresses through the final steps in the rulemaking process, we will continue to clarify and shape the implementation aspects of the proposed rule and consider a white paper on best professional practices as it relates to reporting requirements. Responses to comments submitted during the proposed rule publication phase are currently being addressed.
FINAL RESPONSE:

USDA, APHIS, VS recognizes the concerns of USAHA and appreciates the opportunity to respond. APHIS will continue working to build relationships with aquatic animal health professionals, including researchers, public and private aquarium personnel, and natural resource agency staff, to ensure relevant partners are included in the NLRAD reporting requirements. As the proposed rule progresses through the final steps in the rulemaking process, we will continue to clarify and shape the implementation aspects of the proposed rule and consider a white paper on best professional practices as it relates to reporting requirements. Responses to comments submitted during the proposed rule publication phase are currently being addressed.