

## EFTA Surveillance Authority's Mission to Norway from 20 to 29 May 2019- Norway's comments to the draft report

With reference to the draft report from the EFTA Surveillance Authority ("the Authority") concerning the mission to Norway from 20 to 29 May 2019 in order to evaluate animal health controls in relation to aquaculture animals.

The Norwegian Food Safety Authority ("NFSA") would like to comment on the following findings and conclusions in the draft report:

- Finding # 6: Norway suggests that the text is replaced by the following formulation: *"The NFSA is organized into two administrative levels, the head office and the regions. The head office carries out directorate and governance tasks. The regional level consists of five regions, each divided into local departments (with 70 office locations altogether). The local departments perform the official controls in defined geographical areas, i.e. regions."*
- Finding # 9: During the meetings with the regional offices, it was acknowledged that the fish health and welfare online course offer by the Norwegian University of Life Sciences (NMBU) in collaboration with the NFSA, is a measure regarding the special focus on fish health during the years 2019-2021.
- Finding # 13: the well boat visited by the mission team had a UV disinfection system as well as ozonation on board.
- Finding # 33: Due to a misunderstanding, the representatives of the NFSA stated in the opening meeting that there are no zones free for ISA in Norway. This is not true, in Norway there are both zones and compartments declared free for ISA
- Finding # 37 and 38: We suggest making no reference to the names of the NFSA's regions visited.
- Finding # 57: *Gyrodactylus salaris* and BKD are not part of the diseases listed in Part II of Annex IV to the Directive 2006/88/EC. Both diseases are on the Norwegian national list.
- Finding # 76: We suggest the following text: *"NFSA must inspect each site of ISA free compartments at least twice per year. Both inspections should coincide in time with sampling for maintenance of ISA freedom. The sampling should be carried out by fish health services not employed by the ABOs.* In the opening meeting, representatives of the NFSA stated that

the correct inspection frequency for on- growing farms *which are not in category I or II* was two inspections per production cycle, rather than per year.”

- Find # 109: The private laboratories provide diagnostic services for ISA, BKD and PD, but not for VHS.
- Finding # 54: We suggest the following text: “The mission team noted that in most cases *presented to the mission team*, notifications of suspicion are sent to the general contact e-mail of the NFSA rather than to the functional notification e-mail for the relevant office and/or department of the NFSA. Generally, the local inspector was in copy (in Cc). In one case of a suspicious outbreak of ISA, an e-mail sent by the ABO to the local inspector was not read until ten days later due to the local inspector being on annual leave at the time. *Such a delay is not in line with the guidelines on how to notify the NFSA a suspicion or disease in aquatic animals. Notifications to the functional notification e-mails are most commonly used. These e-mail addresses are listed in the guidelines on notification and the information on suspicion should be read each working day.*”
- Finding # 74: During the opening meeting, representatives from the NFSA stated that Norway will not declare a land-based compartment as ISA-free based on 6 weeks following *in cases where there is a suspicion of ISA or a confirmation of the disease*.
- Finding # 94: With reference to the third line, it is not clear if the “general contingency plan” refers to the “Contingency plan for exotic fish diseases (list 1 and list 2)” or another contingency plan.
- Finding # 95: The NFSA suggests the following text: “The mission team noted that the NFSA handles suspicion of ISA in the same way, regardless of whether the suspicion is based on increased mortality *with a suspicion of ISA* or on a PCR positive analysis from one of the designated laboratories *or the Norwegian Veterinary Institute*. There is a significant delay in official confirmation of an outbreak of ISA or of its absence following an initial notification of suspicion. Furthermore, the average time between the disease being confirmed and establishment of surveillance and protection zone is, according to the NFSA, 25 days. In one case noted by the mission team, 21 weeks passed before the containment area was established following a confirmed ISA outbreak.”
- Finding # 114: The NFSA would like to remark that there is a requirement to notify us by the time of the suspicion and not wait until the results of the laboratory analysis are ready. See also our comments to the Finding # 54.

Please find attached with this letter the actions taken to the recommendations by the Authority described in the draft rapport.

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