



Ms Stella Kyriakides
Commissioner for Health and
Food Safety
European Commission
Rue de la Loi 200
1049 Brussels

Brussels, 10th July 2020

Re: Postponement of the application date of the AHL

Dear Commissioner,

This letter is sent on behalf of six Livestock related associations regarding the date of implementation of the Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law').

Article 283 of the AHL sets the date of application of this Regulation and its delegated acts on 21st April 2021. However, despite the considerable work done by the Commission services to prepare these delegated acts, most of them were not published or adopted before June 2020, even though Article 274 of the AHL provided that they should be adopted by 20th April 2019 at the latest.

This deadline, set in the spirit of AHL recital 172¹, was intended to allow Member States and operators sufficient time to "adapt properly to the new rules". This adaptation period would therefore be reduced by more than a year if the deadline of 21st April 2021 were to be retained (cf. annexed table).

Moreover, the current context linked to the Covid-19 pandemic aggravates this situation. For example, the training sessions about AHL implementation, planned as part of the "Better training for safer food" program, will have to be delayed.

These important delays and the huge amount of work to do within the Member States are of great concern to the competent authorities and operators. Therefore, we ask you to study the possibility to postpone this application date for one year.

¹ The requirements set out in this Regulation should not apply until the key delegated and implementing acts have been adopted by the Commission pursuant to this Regulation, allowing a period of 24 months from the adoption of the key acts until the date when they start to apply, thus permitting Member States and operators to duly adapt to the new rules. In addition, it is appropriate to provide for a period of at least 36 months for the Commission to elaborate the new rules.

With this letter we would also emphasize on the good work that has been done at European level and the need for one set of legislation that drives Animal Health to the next phase.

We hope that this request will hold your attention. We remain at your disposal should you have any point to clarify.

Yours faithfully,

SIGNATURES from all interested organisations



of Animal Health Europe



of AVEC



of Copa and Cogeca



of EFFAB



of FESASS



of UECBV

Annex

Main steps for the application of the Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law')

Main steps		Deadlines set by AHL (a)	Effective dates (b)	Dates of publication (c)	Delays b-a (c-a)
Adoption of key delegated acts (article 274 and article 275)	Delegated Regulation n° 2018/1629	20 April 2019	25 July 2018	31 October 2018	—
	Delegated Regulation n° 2019/2035	20 April 2019	28 June 2019	5 December 2019	2,3 months (7,5 months)
	Delegated Regulation n° 2020/686	20 April 2019	17 December 2019	3 June 2020	8 months (13,5 months)
	Delegated Regulation n° 2020/687	20 April 2019	17 December 2019	3 June 2020	8 months (13,5 months)
	Delegated Regulation n° 2020/688	20 April 2019	17 December 2019	3 June 2020	8 months (13,5 months)
	Delegated Regulation n° 2020/689	20 April 2019	17 December 2019	3 June 2020	8 months (13,5 months)
	Delegated Regulation n° 2020/691	20 April 2019	30 January 2020	3 June 2020	9,4 months (13,5 months)
	Delegated Regulation n° 2020/692	20 April 2019	30 January 2020	3 June 2020	9,4 months (13,5 months)