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United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Veterinary
Services

Washington, DC
20250

Dr. Monique Eloit
Deputy Director General
Ministry of Agriculture
251 rue de Vaugirard
75352 Paris cédex 15
FRANCE

Dear Dr. Eloit:

Thank you for your letter of March 2, 2007, requesting that the U.S. Department of Agriculture (USDA) recognize France as being free of high pathogenicity avian influenza (HPAI) H5N1. We are reviewing the data you provided in support of your request.

The USDA's Animal and Plant Health Inspection Service (APHIS) follows different procedures for recognizing countries or regions as disease free than for removing them from APHIS' list of H5N1-affected regions. As a procedural matter, APHIS will consider removing France from our H5N1-affected list, rather than recognizing France as being free of H5N1. It is important to make this distinction because the considerations for removal are slightly different and somewhat simpler than the procedure for recognizing a region as disease free as described in title 9 of the *Code of Federal Regulations* (9 CFR) section 92.2.

The process of removing France from the H5N1-affected list requires completion of a risk analysis conducted by the Regionalization Evaluation Services – Import (RESI) staff. The RESI staff will base the risk analysis on information your veterinary services provides regarding the epidemiology of your H5N1 outbreaks and the procedures you implemented to contain and eradicate those outbreaks. When the risk analysis is complete, it will be made available for public comment. If we receive no substantive technical comments that would hinder a favorable decision, APHIS will remove France from the list of H5N1-affected regions.

We are reviewing the information you provided to determine if it contains sufficient information to complete the risk analysis. Documentation of the following issues is critical:

- France has been HPAI free for 3 months because of control measures undertaken by an effective veterinary infrastructure.
- HPAI (as defined in 9 CFR) was a notifiable disease in France. There was an ongoing awareness program in place for veterinary officials and the public, and all notified or suspect occurrences of HPAI were subjected to field and laboratory investigations.



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- A surveillance program for HPAI already existed that addressed France's specific needs. This program supported the detection and investigation of outbreaks, including clinical inspection, active and passive surveillance (both serological and agent detection), and serological and virological testing in high-risk areas and of high-risk flocks. These actions were sufficient to detect disease effectively and quickly, even in the absence of clinical signs.
- Under the surveillance program, all notified and/or suspected avian influenza cases were investigated, and officials took appropriate actions including collecting samples, transporting these samples in a manner that ensured their integrity for testing purposes, and documenting subsequent laboratory results.
- The system for recording, managing, and analyzing diagnostic and surveillance data was sufficient to demonstrate the effectiveness of France's disease control measures.
- Laboratory confirmation capabilities were effective, and testing procedures were documented and standardized.
- The eradication program included the definition of appropriate quarantine and surveillance zones, monitoring of those zones, and implementation of movement restrictions. Measures taken by officials were able to contain and control the spread of disease from these zones due to effective program measures. Procedures for lifting quarantines were followed and were sufficient to prevent further spread of disease.
- Documented standard operating procedures described procedures for depopulation, cleaning, disinfecting, and other applicable measures, such as carcass disposal. All relevant personnel were familiar with these standard procedures and followed them during the outbreak. These measures were effective in controlling the disease.
- Premises repopulation, if applicable, occurred according to documented procedures, and there was no disease recurrence. Monitoring results after repopulation demonstrated that the disease was eradicated.

These issues are consistent with the information outlined in Article 2.7.12.2 of the World Organization for Animal Health (OIE) Terrestrial Animal Health Code (2006) as necessary to regain HPAI-free status for a country after that country has reported an outbreak.

We understand that some of this information may be in the documents you have already provided. Once we have reviewed those documents, we can identify additional information required to complete the evaluation.

Dr. Monique Eloit
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Your primary contact for this assessment is Dr. Chip Wells, USDA, APHIS, Veterinary Services, National Center for Import and Export, Regionalization Evaluation Services Staff, Unit 38, 4700 River Road, Riverdale, MD 20737. His telephone number is (301)-734-4356; his fax number is (301) 734-3222; and his e-mail address is Chip.J.Wells@aphis.usda.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "John R. Clifford".

John R. Clifford
Deputy Administrator
Veterinary Services