

EAZA/EAZWV Position Statement: Access to and use of vaccination against Highly Pathogenic Avian Influenza (HPAI) in zoo birds in the European Union



Approved by EAZA Council and EAZWV
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Introduction

This Position Statement has been developed jointly by the European Association of Zoos and Aquaria (EAZA) and the European Association of Zoo and Wildlife Veterinarians (EAZWV).

Highly pathogenic avian influenza (HPAI) outbreaks can have significant negative impacts on the work of the European zoo community, with many bird species within EAZA zoos playing a crucial role in conservation efforts. HPAI outbreaks can be devastating with losses to important breeding stock, disruptions to population management programs, movement restrictions and losses of financial revenue during periods of closure.

Given the apparently changing epidemiology of HPAI in Europe, with viral over-summering in free-living wild bird populations¹, zoos and confined establishments (as defined in Article 4 of [EU Regulation 2016/429](#), 'the Animal Health Law') need appropriate and robust biosecurity measures in place to prevent spill-over of infection into zoo birds in light of these increasing threats. These measures are described below in more detail.

This Position Statement highlights how essential HPAI vaccination is as one of the tools and mechanisms to prevent HPAI outbreaks in zoo birds, and the need for a harmonised approach for competent authority approval utilising EU Regulation 2023/361.

Relevant EU legislation

Infection with HPAI is classified as a Category A animal disease within [EU Regulation 2018/1882](#). The rules for the harmonisation of Category A animal disease control, through the use of veterinary medicinal products, is laid down in [EU Regulation 2023/361](#). This Regulation provides a common framework for the use of vaccination against some Category A animal diseases by Member States, including HPAI, to ensure the safe handling of animals from establishments and areas where vaccination has been carried out.

Specific requirements for the application of HPAI vaccinations, for emergency protective vaccination and preventative vaccination approaches are detailed in Annex XIII of that Regulation. Vaccination programs within a Member State can include all kept birds and poultry, including captive birds kept in confined establishments.

Historically, HPAI vaccination of zoo birds was uniquely afforded to zoos², and authorized through [Commission Decision 2007/598/EC](#), however Member State approaches were highly variable across the EU. EAZA and EAZWV welcome the opportunity to harmonise the use of preventative HPAI vaccination across Member States, through the application of Regulation 2023/361.

In the EU, licensed zoos have legally obligated duties to fulfil roles in conservation whilst maintaining animal welfare as laid down in the EU Zoos Directive, [Council Directive 1999/22/EC](#). These obligations can be jeopardised due to HPAI related restrictions despite the health of zoo populations of captive birds being closely monitored by veterinarians and subject to appropriate levels of record keeping.

Furthermore, joint population management programmes, such as EEPs (EAZA Ex Situ Programmes), can document movements of individuals over time in a transparent way. Additionally, as zoo animals are classified as Category 1 material through the Animal By-products Regulation ([Regulation EC 1069/2009](#)), it is important to recognise that no zoo-kept captive bird enters the human food chain.

EAZA/EAZWV recommendations

1. Use of preventative vaccination against HPAI in captive birds kept in confined establishments

- a) Currently, HPAI vaccination relies on either a H5N2 inactivated vaccine produced by MSD Animal Health, or a H5N9 vaccine by Merial, both of which have been subject to several studies undertaken on zoo birds by EAZA/EAZWV Members, with the use of these vaccines being proven to be safe and effective across a range of non-domestic avian species³⁻⁸. Zoos and confined establishments should also have access to HPAI vaccines currently in development, should these products meet the requirements of Part 5 Annex XIII of Regulation 2023/361.

EAZA and EAZWV encourage Member State competent authorities, state veterinary officers and zoo veterinarians to review the published literature when designing their preventative vaccination programmes.

- b) Zoos open to the public and operating within the EU are subject to the licensing requirements laid down in the EU Zoos Directive ([Council Directive 1999/22/EC](#)). Article 3 of this Directive requires that Member States ensure that licensed zoos have in place a 'developed programme of preventative [...] veterinary care'. Additionally, Part 9 of Annex I of [EU Regulation 2019/2035](#), details the approval requirements for confined establishments in the EU, this includes:

'2. The requirements in relation to surveillance and control measures of confined establishments of kept terrestrial animals, as referred to in Article 16, shall be the following:

[...]

(c) the vaccination and treatment of susceptible kept terrestrial animals against transmissible diseases must be carried out as appropriate'

In the opinion of EAZA and EAZWV, the above required programme of preventative veterinary care, and the approval requirement for vaccination where appropriate, should extend to the use of preventative HPAI vaccination for captive birds kept in confined establishments.

- c) Preventative vaccination against HPAI should be viewed as one tool in the toolbox of mitigation measures against this disease. Implementation of effective biosecurity remains key in reducing the likelihood of infection, such additional measures may include:

- (i) Limiting contact with free-living wild birds, through appropriate housing, separation or altering of feeding practices taking into consideration animal welfare.
- (ii) Enhanced hygiene practices, and the establishment of epidemiological units between different groups of captive birds kept in the confined establishment.
- (iii) Continuous clinical monitoring of avian health and the prompt reporting of any suspected HPAI cases to the relevant competent authority.
- (iv) Quarantining of new birds, specifically those originating from sources other than confined establishments.
- (v) Appropriate risk assessment and contingency planning for an HPAI outbreak.
- (vi) Provision of staff training on the importance of biosecurity and the measures to be taken to prevent HPAI spread.

2. *Movement of HPAI vaccinated zoo birds between EU Member States*

- a) The movement of captive birds between confined establishments located in different EU Member States remains a core component of the previously mentioned EEPs operated through EAZA. EEPs aim at conserving healthy populations of animals, the majority of which are threatened with extinction in their home ranges.

Point 4.1(b) of Part 5 of Annex XIII of Regulation 2023/361 permits the movement requirements for HPAI vaccinated captive birds from a confined establishment:

‘they are vaccinated captive birds from confined establishments moved to a confined establishment in another Member State provided that:

- (i) approval of such type of movements has been granted by the competent authority of destination;
- (ii) they have been subjected to a virological test with negative results within 72 hours before movement;’

EAZA and EAZWV call upon competent authorities to approve the movement of HPAI vaccinated captive birds between confined establishments to facilitate the important ex-situ conservation work being undertaken by our Members. HPAI vaccinated captive birds which are part of conservation population management programmes should have unobstructed transfer options between confined establishments located in different Member States to allow the roles of these programmes to be fulfilled, as movements of these captive birds represent a low risk of spreading HPAI.

- b) Finally, it is important to recognise the traceability and record keeping practices undertaken in EU-based confined establishments. EAZA Members utilise an online centralised database of animal record keeping (ZIMS Species360), this system provides many guarantees on animal traceability and contact tracing, in line with the requirement of Point 9 of Part 1 of Annex II of Regulation 2023/361.

EAZA and EAZWV confirm their commitments to appropriate animal record keeping, meeting this specific criterion for the use of vaccination to prevent and control Category A diseases.

References

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8. Philippa, J. *et al.* Vaccination against highly pathogenic avian influenza H5N1 virus in zoos using an adjuvanted inactivated H5N2 vaccine. *Vaccine* **25**, 3800–3808 (2007).
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About our organisations

EAZA, the European Association of Zoos and Aquaria, is a non-profit association which represents and links over 400 Member institutions in 47 countries (of which 25 are EU Member States). EAZA's mission is to facilitate cooperation across the European zoo and aquarium community towards the goals of education, research and biodiversity conservation through maintaining healthy populations of animals in human care to ensure their long-term survival.

Website: www.eaza.net

EU Transparency Register no: 058910411877-30

EAZWV, the European Association of Zoo and Wildlife Veterinarians, is the professional association representing over 500 individual zoo and wildlife vets throughout Europe, as well as 11 regional/national sections with a collective membership of over 1000. EAZWV is committed to promoting the advancement and dissemination of veterinary knowledge and skill in the field of zoo and wild animal management and in so doing advancing the health, welfare, husbandry and conservation of wild animals.

Website: www.eazwv.org

EU Transparency Register no: 158270723530-82