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Technical specifications for a EU-wide baseline survey of antimicrobial resistance in bacteria from aquaculture animals

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Correspondence: biohaw@efsa.europa.eu **Abstract**

The European Commission requested scientific and technical assistance in the preparation of a EU-wide baseline survey of antimicrobial resistance (AMR) in bacteria from aquaculture animals. It is recommended that the survey would aim at estimating the occurrence of AMR in *Aeromonas* spp. isolated from Atlantic Salmon (*Salmo salar*), European seabass (*Dicentrarchus labrax*) and trout (*Salmo trutta, Salvelinus fontinalis, Oncorhynchus mykiss*) intended to consumption, at harvesting (at farm/slaughter), at the EU level and in addition, at estimating the occurrence and diversity of AMR of *Escherichia coli*, *Enterococcus faecium*, *Enterococcus faecalis*, *Vibrio parahaemolyticus* and *Vibrio alginolyticus* in blue mussel (*Mytilus edulis*) and Mediterranean mussel (*Mytilus galloprovincialis*) from production areas and at dispatch centres at the EU level. These technical specifications define the target populations, the sample size for the survey, sample collection requirements, the analytical methods (for isolation, identification, phenotypic susceptibility testing and further genotypic analysis of some of the bacteria targeted) and the data reporting requirements. The data to be reported by the EU Member States to support this baseline survey are presented in three data models. The results of the survey should be reported using the EFSA reporting system.

KEYWORDS

antimicrobial resistance, aquaculture, cross-sectional prevalence study, finfish, mussels

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1 | **INTRODUCTION**

1.1 | **Background as provided by the requestor**

In its Scientific Report on the technical specifications on harmonised monitoring of AMR in zoonotic and indicator bacteria from food-producing animals and food,¹ EFSA recommended to undertake complementary baseline surveys (BLSs) in addition to the routine testing and reporting of AMR in bovine animals, pigs and poultry as laid down in Commission Implementing Decision (EU) 2020/1729.² The purpose of these complementary BLSs is to assess specifically the epidemiological situation on certain AMR issues, such as prevalence of methicillin-resistant *Staphylococcus aureus* (MRSA) in fattening pigs and prevalence of AMR in bacteria from aquaculture animals. In 2021, EFSA questioned the members of its network on zoonoses and AMR monitoring to collect their views regarding the scope, order of priority and timing of these BLSs. The outcome of this inquiry was that a BLS on AMR in bacteria isolated from aquaculture animals should be performed at a matter of second priority after a BLS on MRSA from fattening pigs. The BLS on MRSA from fattening pigs will start on 1 January 2025 further to the publication of EFSA technical specifications for a baseline survey on the prevalence of methicillin-resistant Staphylococcus aureus (MRSA) in pigs³ and of Commission Implementing Decision (EU) 2023/1017⁴. However, EFSA technical specifications for a BLS on the prevalence of AMR in bacteria from aquaculture animals are still necessary before envisaging starting the collection and analysis of the relevant AMR data on aquaculture animals.

1.2 | **Terms of Reference as provided by the requestor**

In accordance with Article 31 of Regulation (EC) No 178/2002, the Commission requests EFSA to provide technical and scientific support for the development of a BLS on the prevalence of AMR in bacteria isolated from EU produced aquaculture animals,⁵ considering the most recent scientific literature and technological developments, epidemiological trends, and relevance for public health. EFSA is notably asked to propose harmonised approaches for the collection and the analysis of AMR data from aquaculture animals by:

- a. proposing priority combinations of aquaculture animals/target bacteria to be considered in the BLS;
- b. proposing a complete sampling framework for the implementation of the BLS including the origins of bacterial isolates subject to AMR testing, the sampling design and the sample size;
- c. proposing protocols for isolation and characterisation of bacteria;
- d. proposing protocols for phenotypical antimicrobial susceptibility testing of bacterial isolates;
- e. proposing protocols for the testing of bacterial isolates via molecular typing methods;
- f. providing guidance for technical reporting of the BLS data collected by Member States to EFSA.

1.3 | **Interpretation of the terms of reference**

The aim of the BLS is to assess the occurrence of AMR in bacteria from the animal species involved in aquaculture productions (aquaculture animals). The legal definition of aquaculture animals should apply (see notably, article 4 (6) and 4 (7)1 of Regulation (EU) 2016/429 on transmissible animal diseases) to delineate the animal populations to be considered for the BLS. Therefore, animals deriving from on foot fishing/fishing from the shore have not been considered. It is also of note that AMR in bacterial pathogens for aquaculture animals and AMR in aquaculture animals imported from third countries do not belong to the remit of the mandate. The approach is, therefore, to provide first an overview of AMR in bacteria from the main aquaculture animals domestically produced before considering imported seafood.

2 | **RATIONALE/PRINCIPLES OF THE TECHNICAL SPECIFICATIONS**

2.1 | **Rationale for a need for a baseline survey on AMR in aquaculture**

Aquaculture is a growing food production sector in Europe, notably in value, and globally. Europe's varied culture systems include freshwater flow-through raceways or ponds, freshwater and marine cage culture, brackish water or marine ponds, land-based, indoor hatchery, nursery and aquaculture recirculating production systems. The use of antimicrobials

2 OJ L 387, 19.11.2020, p. 8–21.

¹ EFSA Journal 2019;17(6):5709. [https://doi.org/10.2903/j.efsa.2019.5709.](https://doi.org/10.2903/j.efsa.2019.5709)

³ EFSA Journal 2022;20(10):7620.<https://doi.org/10.2903/j.efsa.2022.7620>.

⁴ OJEU L 136, 24.5.2023, p. 78–82.

⁵As defined in Article 4(7) of Regulation (EU) 2016/429 of the European Parliament and 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').

in aquaculture in some cases is unavoidable to treat bacterial disease outbreaks. Several studies have established an association between the use of antimicrobials in aquaculture and an increase in AMR bacteria, as reviewed by Santos and Ramos (Santos & Ramos, 2018). Additionally, some studies support the hypothesis that the development of AMR in aquaculture environments could contribute to AMR of human pathogens and indeed many AMR genes such as, but not limited to, plasmid-mediated quinolone resistance genes, phenicol resistance genes and certain beta-lactamase-encoding genes were identified in aquatic bacteria prior to their detection and dissemination among human and animal pathogens (reviewed by Henriksson et al., 2018 and Santos & Ramos, 2018).

For a proper assessment of the risk posed by AMR in aquaculture to human and animal health, there is a need of comprehensive and comparable data on the occurrence of AMR. The literature search conducted for this work (see below) showed that, at present, there are limited data on the occurrence of AMR in aquaculture in Europe and such data are not comparable, as sampling and antimicrobial susceptibility testing (AST) were performed following different criteria and methods. Monitoring AMR in bacterial organisms from aquaculture poses challenges due to the diversity of aquaculture production in each EU MS/European country, the lack of harmonised AST methods for some bacteria and difficulties in identifying sporadic or intermittent source(s) of contamination, especially in open production system. A BLS on AMR in aquaculture productions in EU/EFTA MSs using statistically based sampling schemes and harmonised antimicrobial susceptibility testing methods will provide data to fill this gap.

These technical specifications have been designed to serve this purpose and to present a unique opportunity for MSs to carry out an EU-wide BLS of AMR in aquaculture animals. This BLS is considered a convenient starting point to initiate harmonised AMR monitoring in bacteria in aquaculture productions. This should optimally be complemented by the monitoring of AMR in pathogens in aquaculture.

2.2 | **Aquatic species targeted**

The technical specifications propose to consider the main aquaculture productions in Europe. The target aquaculture populations are fish from the aquatic species of interest in the EU from final production intended to consumption. The selection of aquatic animal species (and bacteria) to target within the framework of the BLS has been made on (a) the economic value of the commodity and (b) the aquaculture production data at the EU level, as well as (c) at the national level. The aquaculture production database (EUMOFA⁶ database for the year 2021) and the report from the Scientific, Technical and Economic Committee for Fisheries (2023) for the year 2020 has been reviewed to identify the most important aquaculture productions in value and regarding their distributions among the EU/EFTA MSs (complemented with additional available national production data from EFTA countries), so that the highest number of EU/EFTA MSs are involved in the BLS.

It has been selected for marine finfish production: European seabass (*Dicentrarchus labrax*) (Mediterranean Sea) and salmon (*Salmo salar*) (Atlantic ocean) (3 MSs and Norway, Iceland), for freshwater finfish production, varying kinds of trout⁷ (23 MSs and Norway) and for mollusc production, two kinds of mussel (*Mytilus edulis* and *M. galloprovincialis* from Atlantic ocean and from Mediterranean sea) (13 MSs). Statistics on production from more recent years will need to be reassessed before the implementation of the BLS. More detailed information about the distribution of the main aquaculture productions across the EU/EFTA is presented, in an indicative way, in Appendix B.

2.3 | **Rationale for the bacteria targeted**

The BLS focuses on bacteria from healthy aquaculture animals, instead of clinical isolates of pathogens in aquaculture animals. The aquatic animals' gut/gills/mucus is/are in continuum with its immediate environment. AMR findings from isolates from healthy aquatic animals will more likely be an indication of environmental risk factors associated with AMR introduction and spread than directly related to aquatic animal health. The AMR of bacteria from healthy aquatic animals is also likely to be influenced by recent or previous treatment with (where this has been done) and environmental exposure to antimicrobials. Such information remains important for understanding AMR along the aquaculture production chain and provides data for risk analyses and mitigation strategies for both human and animal populations.

2.3.1 | Rationale for including *Escherichia coli* as a target species

In aquaculture products, *Escherichia coli* are indicators of faecal contamination. In particular, filter-feeding shellfish naturally concentrate bacterial contaminants from the environment, EU rules⁸ require and to regularly monitor *E. coli* levels in live bivalve molluscs to estimate risk of food-borne exposure to faecal pathogens and thereby protect EU consumers'

⁸Commission Regulation (EC) No 2073/2005 and Commission Implementing Regulation (EU) 2019/627.

⁶ <https://eumofa.eu/>.

 7 It is also of note that some sea trout are produced at sea and should therefore not be considered within the part of the BLS on freshwater finfish (e.g. in DK, SE, FI or FR) but may be considered within the framework of the sampling of marine finfish production, on a voluntary basis.

safety. The occurrence of *E. coli* in seafood samples varies greatly according to study, which may be explained by environmental conditions, survival time in the water column and microbial quality of farms (Said et al., 2017).

E. coli may be a recipient of resistance genes from marine bacteria as shown in laboratory experiments in which tetracycline resistance from marine strains of *Photobacterium*, *Vibrio*, *Alteromonas* and *Pseudomonas* was transferred to *E. coli* by conjugation (Pepi & Focardi, 2021). Also, *E. coli* in seafood has been shown to carry genes conferring resistance to critically important antimicrobials for human medicine, with the compelling example of a *bla_{VIM-1}-containing E. coli* derived from a Venus clam, harvested in the Mediterranean Sea in Italy and purchased at a German retail market (Roschanski et al., 2017).

Review of the literature (Appendix C) showed that most studies dealing with AMR in *E. coli* from shellfish and finfish have the limitations of small sample size and diversity of laboratory methods, that compromise representativeness and comparability of results. Additionally, the number of studies dealing with samples collected at the farm level is limited, while various studies focus on samples collected at the processing industry and retail levels. However, the bacterial microbiota recovered from retail products probably represents the microbiota that shellfish and finfish are exposed to during processing (e.g. repeated handling and exposure to surfaces and water that may be contaminated) rather than the indigenous microbiota of shellfish and finfish or the environmental microbiota of the aquaculture site of origin (Noor Uddin et al., 2013).

The monitoring of AMR in *E. coli* from aquaculture products at production sites may give important indications regarding the circulation of resistant bacteria in the population residing in the basin of the area of origin (Albini et al., 2022), and determining the possible sources of AMR is important for controlling the occurrence and spread of AMR at shellfish and finfish farming facilities and for lowering the risk of AMR spread from the farms to surrounding environments and to humans.

2.3.2 | Rationale for including *K. pneumoniae* on a voluntary basis

Enteric bacteria can survive exposure to seawater but may subsequently lose the ability to form colonies on solid culture media (Rozen & Belkin, 2001). In freshwater, *E. coli* survival was higher in sediment than in the water column (Baker et al., 2021). Different species of Enterobacterales may have different properties in relation to environmental survival in sea and freshwater. *Klebsiella pneumoniae* and other Klebsiella species can frequently be detected in environments including surface water and have been the subject of previous studies of both marine and freshwaters (Podschun et al., 2001). On a voluntary basis, MSs may therefore include in the baseline survey, monitoring of *K. pneumoniae* in addition to monitoring of *E. coli*. In addition, like *E. coli*, *K. pneumoniae* may be a cause of bloodstream and urinary and respiratory tract infections in humans and is easily transmissible (ECDC, 2023). Inclusion of *K. pneumoniae* will be extremely useful in the baseline survey, if the recovery rate of *E. coli* is low, as *K. pneumoniae* is more frequently recovered from the aqueous milieu, including coastal waters.

2.3.3 | Rationale for including *enterococci*. as a target

Similar to *E. coli*, *Enterococcus* sp. may be used as indicators of faecal contamination in aquatic environments. Review of the literature (Appendix C) showed that the studies on AMR in *Enterococcus* sp. from aquaculture products suffer the same limitations of the studies on *E. coli*, i.e. limited representativeness and comparability of results due to small sample size and diversity of laboratory methods employed. Additionally, the number of studies on AMR in *Enterococcus* sp. from aquaculture products is limited, which shows that there is a need to collect such information for risk assessment.

Various *Enterococcus* species have been detected in aquaculture products, which may be a consequence of the contamination from faecal material from different sources. It has been suggested that the enterococcal composition is specific to host species, with the dominant species in cattle being *E. hirae*, *E. saccharolyticus* and *E. mundtii*, and the dominant species in pigs and birds being *E. faecalis* and *E. faecium*, respectively. In humans, *E. faecalis* and *E. faecium* are both present and are therefore the main enterococcal species for which AMR monitoring is relevant from a public health perspective (Tamai & Suzuki, 2023), and are therefore, proposed to be addressed in the BLS.

2.3.4 | Rationale for including *Aeromonas* spp. as a target genus

The genus Aeromonas belongs to the Aeromonadaceae family, which itself is part of the Aeromonadales order and Gammaproteobacteria class (Fernández-Bravo & Figueras, 2020). This genus is autochthonous of the aquatic environment and easily detected in all kind of water, from freshwater to marine water, including wastewater. *Aeromonas* populations were identified using 16S rRNA gene libraries among human, agriculture, aquaculture, drinking water, surface water and wastewater samples, supporting its use as indicator bacteria to study AMR (Jones et al., 2023; Lamy et al., 2022). Certain species of Aeromonas are causative agents of infections in fish (Austin, 2015). An important range of Aeromonas, including *A. allosaccharophila*, *A. bestiarum*, *A. caviae*, *A. hydrophila*, *A. jandaei*, *A. salmonicida*, *A. schubertii*, *A. sobria* biovar *sobria* and *A. veronii* biovar *sobria*, have been associated with disease of predominantly freshwater fish in a significant number of countries (Figueras & Baez-Higalgo, 2015) and primarily in Salmonids. Natural transformation is a general property of Aeromonas environmental isolates (Huddleston et al., 2013). Moreover, integrons and other genetic elements are frequently detected in Aeromonas. These properties have led to a greater interest in studying *Aeromonas* spp. at the genus level, as an indicator of the dissemination of antimicrobial resistance in water (Usui et al., 2016; Varela et al., 2016) or in fish (Naviner et al., 2006, 2011). Aeromonas may also be an opportunist pathogen for humans (Chen et al., 2021; Lamy et al., 2009).

2.3.5 | Rationale for including *V. alginolyticus* and *V*. *parahaemolyticus* as target species

The Aquatic Animal Health Code published by the WOAH specifically identifies *V. parahaemolyticus* as one of the species that should be included in monitoring and surveillance programmes antibiotic susceptibilities of bacteria isolated from aquatic animals (WOAH, 2024).9 *V. parahaemolyticus* is a ubiquitous Gram-negative bacterium found naturally in marine and estuarine waters (Baker-Austin et al., 2010) and is regularly isolated from aquaculture products (Yang et al., 2020). Infections of humans with *V. parahaemolyticus* are most frequently associated with the consumption of aquatic animals particularly those that are consumed without cooking. *V. parahaemolyticus* is not an invasive pathogen (Onohuean et al., 2022) and these infections normally result in a self-limiting gastroenteritis (Baker-Austin et al., 2010). *V. parahaemolyticus* infections have also been reported as the causal agents of diseases in aquatic animals. Of these, acute hepatopancreatic necrosis (AHPND) that primarily affects penaeid shrimp is probably the most economically significant (Kumar et al., 2020). In addition, Ina-Salwany et al. (2019) have reviewed reports of diseases that have been causally related to *V. parahaemolyticus* infections in prawns, tilapia, catfish and a variety of shellfish in a variety of Asian and African countries.

V. alginolyticus is considered as one of the most common pathogenic species for human (Baker-Austin et al., 2018). *V. alginolyticus* are most commonly responsible for ear and wound infection, and rarely sepsis, both related to exposure to seawater (Baker-Austin et al., 2017). Sporadic cases of *V. alginolyticus* infections have been reported in Europe: e.g. in Guernsey, as wound infection associated with seawater, and in North Sea, after bathing (Schets et al., 2006, 2011). *V. alginolyticus* has been isolated from mussels in central Adriatic Sea in Italy (Bacchiocchi et al., 2021): in 2018, 62% of samples of mussels tested positive for *V. alginolyticus* (50/81) (0% for *V. parahaemolyticus*), while in 2019, 40% of samples of mussels tested positive for *V. alginolyticus* (14/35). In North Sea, *V. alginolyticus* has been described as the dominant Vibrio species at Helgoland Roads, followed by *V. parahaemolyticus* (Oberbeckmann et al., 2011).

The EFSA Scientific Opinion on Vibrio has recommended as a key priority for future research to establish an EU-wide baseline survey for the relevant *Vibrio* spp. in relevant seafood products, including in particular, primary production (EFSA, 2024).

2.4 | **Other technical aspects**

The technical specifications follow harmonised AST methods within the framework of the BLS to provide representative, robust and reproducible data on the occurrence and spread of AMR and help identify emerging or specific resistance patterns.

The technical specifications are based on a robust randomised sampling procedure, mostly relying on stratified sampling approach with proportional allocation of the sample numbers per strata, as typically implemented within the framework of the routine monitoring of AMR in food-producing animals and food. The design has been developed and optimised to estimate the occurrence of AMR in bacteria at the EU level.

2.5 | **Priority combinations of aquaculture animals/target bacteria in the BLS**

In shellfish production (mussels), *E. coli* and *Enterococcus faecalis/E. faecium* appear as good candidates. Those bacteria inform about the faecal contamination of water and anthropogenic environmental pollution. Specific monitoring of extended-spectrum beta-lactamases (ESBL)/carbapenemase (CP)-producing *E. coli* can also be performed to compare with results obtained in terrestrial animals. On a voluntary basis, *E. coli* may be complemented with *Klebsiella pneumoniae*, in particular if the prevalence of *E. coli* in mussels is very low. Laboratory protocols developed by the EURL-AR and already implemented by the NRLs apply. *V. alginolyticus* and *V. parahaemolyticus* may be pathogenic species for human.

In finfish production, whether in marine water (salmon and seabass) or freshwater (trout), *Aeromonas* spp. (at the genus level) is retained. Monitoring of AMR in *Aeromonas* spp. (at the genus level) is easier to perform than in other bacteria for a number of technical reasons. The chance to detect *Aeromonas* spp. is higher than that of other bacteria and is evenly distributed all along the year, which allows to consider a possible seasonal effect.

Regarding AST, a plate of antimicrobial substances has been proposed recently to study AMR in Vibrio and Aeromonas (Baron et al., 2017; Baron et al., 2020; Smith et al., 2023). Table 1 below presents the proposed combinations of aquatic species and bacteria that should be targeted by the BLS.

TABLE 1 Combinations of bacterial organisms/aquatic animal species to be tested for antimicrobial susceptibility within the BLS in the EU.

	Marine finfish production: Salmon, seabass	Freshwater finfish production: Trout	Mollusc production: Mussels
Aeromonas spp.			NA
E . coli ^a	NA	NA	□
ESBL-/CP-producing E. coli	NA	NA	П
E. faecium and E. faecalis	NA	NA	П
V. parahaemolyticus and V. alginolyticus	NA	NA	

Abbreviation: NA: not applicable

^aE. coli may be complemented on a voluntary basis with *Klebsiella pneumoniae*, in particular if the prevalence of *E. coli* in mussels is very low.

2.6 | **Rationale for the year of implementation of the BLS**

It is proposed to perform the BLS on AMR in aquaculture animals in 2027. From 2027 onwards, MSs will have to start reporting antimicrobial use data for the main finfish species, i.e. Atlantic salmon, trout, gilthead seabream, European seabass, common carp, to the European Medicine Agency, as per Article 15 1(d) of the Commission delegated regulation 2021/578. This would allow to compare data on AMR and antimicrobial consumption (AMC) at the country level, as a secondary objective. It would request a representative sampling at the national level, which would imply collecting complementary samples to those necessary to assess AMR in bacteria at the EU level.

3 | **OBJECTIVES OF THE SURVEY**

The primary objectives of the survey are:

- **•** (Ia) To assess the prevalence of antimicrobial-resistant microorganisms and the occurrence and diversity of AMR in microorganisms from the main aquaculture productions in the EU,
- **•** (Ib) To indirectly assess, through filter feeding molluscs produced within the EU, the degree of environmental anthropogenic contamination with resistant bacteria in European production waters.

The secondary objective of the survey is:

• To explore the link between AMC and AMR in finfish aquaculture.

4 | **SURVEY DESIGN**

This section describes the methodology used to design the BLS to estimate the occurrence of AMR in bacteria isolated from the EU-produced aquaculture animal species targeted. The methodological principles to determine the sample size (the required number of isolates to be tested for antimicrobial susceptibility and the related number of epidemiological units (batches of animals) to be sampled) are explained.¹⁰ The focus is primarily on the primary objective, but some attention also goes to the secondary objective.

4.1 | **General considerations on a representative and random sampling**

Bacterial isolates tested for antimicrobial susceptibility should derive from a harmonised active sampling so that the determination of bacterial prevalence in the studied animal populations, as well as the occurrence of AMR and the prevalence of resistant bacteria can be estimated. Isolates should originate from healthy animals sampled from randomly selected epidemiological units. Randomised sampling strategies should be used, allowing for proper statistical data analysis, and reducing the effect of sampling bias. A random sample in each animal population targeted ensures the representativeness of the entire population, which requires a sufficiently large sample size per stratum, and also reflects variability in risk factors/markers and different country/regions.

¹⁰Detailed illustrations of the application of these principles are provided in Appendix G, based on a number of parameters and aquaculture production volumes for 2020 (JRC report).

4.2 | **Definitions**

The objective is to estimate the occurrence of AMR in bacteria isolated from EU-produced aquaculture animals for each combination (aquatic species/bacteria/antimicrobial substance, as enumerated in Section 2) in an effective way. The **occurrence¹¹ of AMR** p_r is defined as the proportion of resistance, i.e. the probability that a bacterial isolate from a particular aquatic species of EU-produced aquaculture animals is resistant to the antimicrobial substance of interest. The design is developed and optimised to estimate the **occurrence of AMR p**_r at the EU level.

Bacterial isolates tested for antimicrobial susceptibility originate from **production batches** (**PB**, see next section on sampling design and sampling frame) of the aquaculture species. The bacterial **prevalence** π_{bn} denotes the probability that a PB tested positive, i.e. it comprises at least one fish/mussel tested positive for the bacteria of interest. Given that a PB is positive, the proportion of positive fish within that positive PB is denoted by the **within PB prevalence** π_{wbp} . As testing all fish from a PB individually is not feasible, a small **sample batch SB** of fish/mussel of a particular size is randomly taken from the PB for testing. The SB will not result in isolated bacteria if the PB does not test positive. If the PB is positive for the bacteria of interest, there is a probability that the sample batch will lead to an isolate, depending on several factors including the magnitude of the within PB prevalence π_{wbo} and the size of the sample batch.

The estimation of the prevalence π_{bp} and the within PB prevalence π_{wbp} is not an objective of the survey per se, but their (unknown) values play a role in determining the required number of isolates to estimate the **AMR occurrence** $\bm p_r$ effectively.

4.3 | **Sampling design and sampling frame**

The specific characteristics of the sampling frame depend on the particular combination aquaculture animal/bacteria considered, but the general structure is generic, with the EU divided into MS-based subpopulations (**strata**), with production units (**PUs**) randomly sampled within each stratum and with **PB** randomly sampled within each **PU** (Table 2). The sampling procedure mostly relies on a stratified sampling¹² approach with proportional allocation of the sample numbers per strata. The general structure is presented below. An approximately equal distribution of the collected samples over the year enables the different seasons to be covered.¹³ The design follows the generic proportionate stratified sampling approach already implemented for AMR monitoring, as presented in the technical specifications on harmonised AMR monitoring (EFSA, 2019).

The results of applying the generic approach of the sampling design to the characteristics of some illustrative combinations are illustrated in Appendix G, using available data. While preparing for the implementation of the BLS, sample size calculation will be adapted using more recent data. Further guidance will be provided by EFSA.

TABLE 2 Survey design: Stratified sampling with main strata at MS level, random sampling of production units at secondary level and sampling of batches (of minimal sizes).

^aThe minimal size is based on the minimal biological material necessary for the testing.

The BLS is based on the representative and random collection of PBs at PUs. MSs or MS regions serve as strata¹⁴ within the EU (referred to as EU strata).

The total number of PBs to be sampled within an EU stratum is based on stratified sampling with proportional allocation, using proportions reflecting the relative production volumes of the strata at the EU level. Deviations from standard proportional allocation might be applied by applying a minimum and maximum number of PBs for an EU stratum (see Section 5.1.2 for the minimum and maximum number of isolates). It is further proposed that four PBs be sampled from the same PU so that they can be approximately equally distributed over the four quarter of the year.

¹²Stratified sampling is a method of sampling from a population which involves, in a first step, the division of a population into smaller groups known as strata. The strata are based on members' shared attributes or characteristics. In a second step, a random sample from each stratum is taken in a number proportional to the stratum's size when compared to the population. These subsets of the strata are then pooled to form a random sample. In practice, stratified random sampling is typically employed in large-scale surveys to reduce some of the logistical costs associated with collecting epidemiological information.

¹¹The occurrence of AMR in isolated bacteria differs from the prevalence of AMR, which refers to the proportion of sample batches harbouring resistant bacteria.

¹³Still, it is of note that in certain MSs, for the most part, slaughtering of fish is not done around the year equally, as some fish are under ice cover in the winter. These may limit the sampling possibilities all year round.

 14 Countries and regions are taken as strata, as seasonal effect, watershed and water quality (depending on the type of ground) can apply differently from a region to another.

The **epidemiological units** defining the sampling frame are the PBs, the production batches, defined as groups of fish at the harvesting, of the same age raised together under the same conditions and exposed to the same risk factors/ markers.

5 | **SAMPLE SIZES**

The sample size (i.e. the number of isolates to be tested for susceptibility at each sampling time) should allow, within a predetermined accuracy, the calculation of the occurrence of AMR (proportion of antimicrobial resistance to a particular antimicrobial) for a given combination of bacteria/animal populations.

The first section describes the sample size calculation's starting point: the required number of isolates. In a later section, the required number of isolates is translated to the required number of PBs (production batches) to be sampled. The last section illustrates the application of the general principles, depending on the knowledge of unknown parameters and the chosen strategy.

5.1 | **Standard calculation of the required number of isolates at the EU level**

The required total number $n_{i\alpha}$ of bacterial isolates is determined to achieve an 'effective' estimation of the occurrence of AMR $p_{_{\boldsymbol{r}}}$ i.e. estimation with preassigned level of confidence and accuracy.

This required number n_{iso} depends on the target parameter p_r itself. The required sample sizes for a grid of values for p_{r} for confidence levels 0.80 and 0.95, and for three values for accuracy15 *a* are presented in Table D.1 in Appendix D. Note that the table of required numbers is symmetric around its maximum at $p_r = 0.5$.¹⁶ Several methods exist to compute the confidence interval for a proportion, leading to slightly varying numbers of sample sizes. The Wilson's generally recommended method was applied (Brown et al., 2001) with the R-function ssize.propCI() from the MKpower package.

5.1.1 | Accounting for possible missing data and loss during storage

As considered already in the technical specifications for harmonised AMR monitoring (EFSA, 2019), the required number of isolates to be tested should be further inflated by 5% to consider a 5% occurrence of possible missing data and by 2% to account for the possible loss of strains during storage, leading to the additional adjustments

$$
n_{iso} \longleftarrow n_{iso} \times 1.05 \times 1.02.
$$

The required numbers before and after adjustment are shown in Table 12 in Appendix D.

5.1.2 | Choices at the EU and the strata level

The standard choice of confidence level is 0.95. If the objective is to estimate the AMR occurrence at the MS level, a typical choice for the accuracy would be 0.1.¹⁷ The objective here is to estimate the occurrence of AMR p_r at the EU level. Therefore, an accuracy of 0.05 is chosen, leading to **the required number of isolates 416** (last column of Table 12 in Appendix D) **at the EU level**. Proportional allocation will determine the required number n_{iso}^{str} of isolates for an EU stratum.

As the production volume distribution can be highly skewed between the MSs/strata, leading to highly varying proportions for the proportional allocation, the number n_{iso}^{str} of isolates for an EU stratum is truncated downwards by a minimum and upwards by a maximum.

- The maximum is determined by taking $p_r = 0.5$ and applying an accuracy of 0.1 and the confidence level to 0.95, leading to the max $=107$.
- **•** The minimum is determined by lowering the accuracy to 0.2 and the confidence level to 0.80. Although these are loose requirements, it implies at least min=13 isolates for each EU stratum, guaranteeing a minimum number of resistance data for the second objective of the BLS (linking AMR to AMC).

Also, note that this minimum and maximum will still be further adjusted (increased) by the intra-PU correlation (see next section).

¹⁵Interval estimation with accuracy *a* corresponds to a confidence interval of width *2a*.

¹⁶In the absence of knowledge a priori about the magnitude of pr, it is conservative to consider pr=0.5. Otherwise, if there is some available knowledge about p_r e.g. from the literature, this can be used to optimise the sample size calculation.

¹⁷See for example the technical specifications for the BLS on MRSA in pigs (EFSA, 2022)

5.1.3 | Multiple PB for the same PU

Resistance outcomes from multiple isolates from the same PU might not be independent but rather correlated, as they share similar conditions from the same PU (compared to PBs from different PUs). This correlation resulting from the hierarchical structure of the design needs to be taken into account by a so-called design effect $(1+(m_{PU}-1)\rho_{IPU})$ with m_{PU} the number of isolates from the same PU and *ρ*_{IPU} the intra-PU correlation, resulting in the additional multiplicative adjustment factor:

$$
n_{iso}^{str} \longleftarrow n_{iso}^{str} \times \min\bigl(\bigl(1 + \bigl(m_{PU} - 1\bigr) \rho_{IPU}\bigr)\bigr).
$$

Note that this design effect has a substantial impact. For instance, for a moderate correlation of 0.2 (see example presented in Appendix F) and quarterly sampled PBs, the multiplicative adjustment factor equals $(1+(m_{PU}-1)\rho_{IPU})$ = 1.6.

5.1.4 | Finite population correction factor

For a finite population size N, the sample size of the EU strata can be adjusted by the population correction factor (FPC)

$$
n_{iso}^{str} \longleftarrow n_{iso}^{str} \times \frac{N}{N + n_{iso}^{str}}.
$$

As the sample of isolates is small compared to the total population of isolated bacteria from batches (less than 5%), the FPC is approximately equal to 1, and applying an FPC is not useful.

5.2 | **From the number of isolates to the number of production batches**

This conversion can be applied uniformly across all EU strata or adapted to the specific knowledge available for specific EU strata. For notational simplicity, the superscript 'str' is omitted.

5.2.1 | From isolate to production batch

A sample batch will not always result in an isolate for susceptibility testing. Indeed, only a positive PB (production batch with at least one fish tested positive for the bacteria) may lead to an isolate. As **the prevalence** π_{bn} denotes the probability that a PB has at least one fish positive for the bacteria of interest, we have that $n_{iso} = n_b \times \pi_{bo}$ where n_b denotes the number of PBs, resulting in the number of production batches:

$$
n_b = \frac{n_{iso}}{\pi_{bp}}.
$$

However, even a positive PB will not necessarily result in isolated bacteria. It depends on the probability that bacteria are detected in the sampled batch SB from the PB. This **sample batch sensitivity** *BSe* depends on (i) the **within PB prevalence** π_{wbn} (proportion of positive fish within a positive batch, a proportion that might vary across PBs and PUs), (ii) the size of the production batch M, (iii) the size of the sample batch m, (iv) the sensitivity *TSe* of the test applied. The *BSe* increases with π_{wbo} , m, Tseand decreases with M and with heterogeneity across batches. We assume no false positives (specificity very high). This leads to the further adjusted required number of production batches:

$$
n_b = \frac{n_{iso}}{\pi_{bp} BSe}.
$$

Note that the denominator $\pi_{bp}BSe$ representes the probability that a PB is detected to be positive. For simplicity, we assume that M is very large and *TSe*≈ 1, and we apply the beta-binomial probability model to deal with heterogeneity. The beta-binomial is an extension of the binomial model and can accommodate heterogeneity (overdispersion) through the additional **intra-batch correlation parameter** ρ (see section 4.3.1 in Aerts et al., 2002). It is assumed that testing the batch as one pool as compared to testing the fish of the batch individually only reduces the *BSe* in a limited way (e.g. see Table 4 in EFSA, 2022). Table E.1 provides values for *BSe* for varying values of m , π_{wbp} and ρ (details and formulas producing this table are briefly discussed in Appendix F). It shows that the batch sensitivity *BSe* increases with π_{wbp} and decreases as intra-batch correlation increases. Note that for correlation $\rho = 1$, the information in a batch of fish reduces to that of a single fish, and the *BSe* values are no longer varying with sample batch size *m* and are equal to the π_{wbp} .

Using the table for choosing an appropriate size m for the sample batch and for determining the required number of PBs assumes knowledge about the intra-batch correlation parameter ρ and the within PB prevalence π_{wbp} . Such knowledge might be obtainable from literature. For instance, suppose a particular stratum takes 25% of the total EU production;

suppose that four PBs of batch size 15 are sampled corresponding to four quarters and suppose that the intra-PU correlation can be taken as 0.2. This would lead to the required number of isolates for that stratum $n_{iso}^{str} = 416 \times 0.25 \times 1.6 = 166.4$. The analysis presented in Appendix F reveals that (i) π_{bp} is estimated as close to 0.9, (ii) π_{wbp} is estimated as close to 0.5 and (iii) ρ is estimated as close to 0.2. From Table E.1, we find that *BSe* \approx 0.98 such that $n_b^{str} = \frac{n_c p_{166.4}}{0.9 \times 0.98} = 189$ PBs are needed, or four PBs need to be sampled quarterly from 48 PUs. See Appendix G for more elaborate illustrations.

If such knowledge is unavailable, two options can be taken: a conservative choice based on a maximum number of PBs (as based on the maximum number of isolates), or a sequential approach, in which knowledge over time is accumulated and the number n_b PBs for the next period is based on analysing the data of all previous periods (see next section).

5.2.1.1 | *A sequential approach*

In case there is insufficient knowledge about the probability that a PB is detected to be positive, and if multiple BPs are collected over time (e.g. quarterly), the required number of PBs can be adjusted by a sequential procedure based on all data from previous periods. Such adjustments must be performed after each period and can go in both directions. If an MS opts for such a sequential procedure, it is desirable to document it by providing relevant data from the previous periods and a short report to EFSA with the calculations leading to the adjusted sample size. For an example of such a sequential approach, see section 4.3.4 in the technical specifications for a BLS on the prevalence of MRSA in pigs (EFSA, 2022).

6 | **SAMPLING PLAN AND SAMPLE COLLECTION**

6.1 | **Sampling plan**

The general characteristics of the proportional stratified sampling approach are summarised in Table 3. It illustrates stratified sampling concepts, such as strata, proportional allocation, epidemiological unit, to the sampling plans proposed. The BLS is based on the representative and random collection of PBs at PUs. MSs or MS regions serve as strata within the EU (referred to as EU strata). Deviations from standard proportional allocation might be applied by applying a minimum and maximum number of PBs for an EU stratum (see Section 5.1.2 for the minimum and maximum number of isolates). It is further proposed that four PBs be sampled from the same PU and approximately equally distributed over the year.

TABLE 3 General characteristics of the stratified sampling approach.

Abbreviations: DC, dispatch centre; MS, member state; PA, production area; PB, production batch; PU, production unit.

^aThe source population of seabass/salmon and trout covers that domestically produced in the 'largest' regions accumulating at least 60% of the total production in the MS. ^bTrout includes rainbow trout, brook trout and other kinds of trout (sea trout produced at sea excepted).

c Mussels includes blue mussels and Mediterranean mussels.

^dThe total number of PBs to be sampled within an EU stratum is based on stratified sampling with proportional allocation, using proportions reflecting the relative production volumes of the strata at the EU level.

^eDeviations from standard proportional allocation might be applied by applying a minimum and maximum number of PBs for an EU stratum (see Section 5.1.2 for the minimum and maximum number of isolates).

f The PUs are randomly selected from the sampling frame (list of PUs) maintained by the Competent Authority of the MS.

⁹The number of PUs equals the number of PBs divided by 4.

^hWithin the production/harvesting area.

6.2 | **Sampling and type of samples**

6.2.1 | Sampling

Sampling should be planned at the required frequency at the selected locations (e.g. production units, dispatch centres and production areas). As far as possible, the locations should be visited on different days in the week and month over the period of the survey. Consideration should also be given to the requirement for initial processing of the sample by the laboratory to be performed within 72 h of taking the sample, and for samples to arrive at the laboratory during the working week. For example, sampling on Friday should be avoided without prior agreement with the laboratory.

6.2.2 | Samples from finfish

For each randomly selected epidemiological unit (production batch) of finfish, five marine finfish (seabass and salmon) or freshwater finfish (trout) are sampled, from which all gill arches are collected bilaterally and pooled. A grammage of at least 25 g per pooled sample of gills¹⁸ deriving from the five finfish sampled¹⁹ should be reached. Gills are relevant samples with respect to sampling standardisation, availability²⁰ and easiness to collect. Regarding the sampling stage, samples are taken at harvesting, i.e. either at post-harvest on the farm or after euthanasia at the slaughterhouse, depending on the size of the PUs (farm) and the structure of the production sector considered. The time elapsed between killing and sampling should be short. The time elapsed between sampling time and the starting of the isolation protocol should be harmonised at 72 h. Each sample should be labelled with a unique number which should be used from sampling to testing. The use of unique numbering system at the country level is recommended.

6.2.3 | Samples from mussels

The locations within a geographical region visited at the same time should be varied. Where more than one mussel species is present at the sample site, a sample of only one mussel species is required for the survey.

A sample of 15 live mussels should be taken and dispatched to the designated laboratory for pooled analysis. During sampling, precautions should be taken in order to avoid any activity that could affect the levels of bacterial contamination or result in a sample that is unsuitable for laboratory analysis. The mussels are to be placed in an intact food grade plastic bag or box (single use), securely packaged and dispatched to the laboratory.

Representative sampling points within production/harvesting areas: Where multiple representative sampling points²¹ are present in the same production area, the representative sampling point, where mussel species are present, with the highest levels of *E. coli* contamination based on the routine monitoring performed under Regulation 2019/627 should be used to obtain the sample of mussels. It is important that the mussels sampled, have been growing in the selected production area for more than 28days, in order to be representative of this area and not a previous one.

Approved dispatch centres: The sample should be taken from one batch of live mussels present on the premises at the time of visit. Fifteen mussels should be selected from the boxes on the packing line (representative of the sizes and grades of animals in the batch). The sample should not contain a mix of mussel species.

7 | **LABORATORY METHODS**

This chapter presents an overview of the laboratory methods for isolating and confirming the bacteria addressed in the BLS. For the sake of harmonisation, detailed protocols will be drafted and issued on the EURL-AR website while preparing for the implementation of the BLS.

7.1 | **Laboratory methods for** *E. coli* **and** *K. pneumoniae*

7.1.1 | Overview

Monitoring of AMR in indicator commensal *E. coli* is a pivotal element of the EU-wide monitoring and serve as a marker for the exposure of the population of *E. coli* to antimicrobial selection pressure. Thus, indicator commensal *E. coli* can

¹⁸Considering an expected prevalence of about 90% for *Aeromonas* spp. in finfish, it is considered sufficiently high grammage to detect contamination with a sufficiently high probability.

 19 Trout portion are the smallest finfish to sample, whereas trout for filleting are of a bigger size, as well as salmon and seabass. It implies to prioritise the sampling of bigger trout portion from the production batch.

 20 Gills are of a lesser economical value and removal has a limited impact on the commercial value of fish.

²¹Used for monitoring activities under Regulation 2019/627.

supplement the continuous evidence on trends of AMR in terrestrial food animals when introducing a baseline monitoring of in aquatic species and seafood.

7.1.2 | Isolation methods

It is proposed to continue with the methodology already applied by the MSs for the isolation of indicator commensal *E. coli* in food using 25g of samples taken mixed with 225 mL of buffered peptone water (BPW) and incubated at 37°C±1°C for 18–22 h. Following incubation, one loopful (10 μL loop) of the pre-enrichment culture in BPW is applied by a single streak onto a MacConkey agar plate and incubated at 37°C±1°C for 18–22 h.

In cases where the MacConkey agar plate yields growth of mucoid colonies which may be *Klebsiella* spp. then on a voluntary basis, MSs may also subculture these colonies and presumptively identify them using standard biochemical tests (MALDI-TOF among others). As a further voluntary measure, the MacConkey plate may be supplemented with an additional Simmons citrate agar plate with inositol to target recovery of Klebsiella (Kregten et al., 1984).²² Subsequent testing of *K. pneumoniae* should be run in parallel with that of *E. coli*.

7.1.3 | Confirmatory testing and typing

MSs can apply both conventional microbiological and biochemical approaches, as well as molecular and whole genome sequencing (WGS)-based methods, as there is no harmonised method for the identification of indicator commensal *E. coli* of the EU monitoring of AMR.

7.1.4 | Antimicrobial susceptibility testing

Standardised dilution methods give a semi-quantitative measurement of the susceptibility as an antimicrobial concentration (expressed in mg/L) that is reproducible between different laboratories with a biological variation (one dilution step). As the European Committee on Antimicrobial Susceptibility Testing (EUCAST) website ([https://www.eucast.org/\)](https://www.eucast.org/) gives access to aggregated distributions of minimum inhibitory concentration (MIC) for these bacterial species, as well as defining epidemiological cut-off values (ECOFFs, Kahlmeter et al., 2003) and clinical breakpoints (CBPs) in human medicine, data obtained by making use of dilution methods can be interpreted for both epidemiological and clinical purposes, provided that the dilution range used frames both thresholds. It is proposed to continue with the previous recommendation for the use of standardised dilution methods for antimicrobial susceptibility testing (AST) of indicator commensal *E. coli* targeted by the harmonised monitoring (EFSA, 2019). Thus, the protocol of the Broth Micro Dilution (BMD) method according to the reference method ISO 20776-1:2019 and provided by the EURL for antimicrobial resistance (EURL-AR) shall be applied to test the susceptibility to the specified list of antimicrobials, with predefined appropriate dilution ranges and ECOFFs set out in Table 4. The existing quality assurance system using ATCC quality control strains should be also reinforced.

TABLE 4 Panel of antimicrobial substances to be included in AMR monitoring, EUCAST thresholds for resistance and concentration ranges to be tested in indicator commensal *E. coli.*

 22 An optimised protocol, initially designed for human faeces has been validated for food items and is available at: [https://www.protocols.io/view/isolation-of-klebs](https://www.protocols.io/view/isolation-of-klebsiella-strains-from-food-samples-4r3l282b4l1y/v1) [iella-strains-from-food-samples-4r3l282b4l1y/v1](https://www.protocols.io/view/isolation-of-klebsiella-strains-from-food-samples-4r3l282b4l1y/v1). This protocol is intended for isolation of Klebsiella strains from different food sources. It is derived from the initial description of the SCAi medium (van Kregten et al., 1984), and its validation across a diversity of Klebsiella strains (Passet & Brisse, 2015). The protocol entails enrichment using buffered peptone water (BPW), and plating on SCAi (Simmons Citrate with Inositol) agar.

TABLE 4 (Continued)

Abbreviations: CBP, clinical breakpoint; ECOFF, epidemiological cut-off value; NA, not available.

^aEUCAST ECOFFs and CBPs available as in Decision (EU) 2020/1729. For the sake of consistency, the ECOFFs laid down in the legislation have been retained at this stage. Thresholds will be reviewed prior to the implementation of the BLS; further guidance will be provided by the EURL-AR and EFSA.

7.2 | **Laboratory methods for ESBL-producing** *E. coli*

7.2.1 | Overview

Enterobacterales producing extended-spectrum beta-lactamases (ESBLs), AmpC cephalosporinases and carbapenemases are of major public health significance. In 2021, it was decided to be mandatory to also monitor in the specific monitoring of ESBL- or AmpC- or CP-producing *E. coli* for carbapenemase producing *E. coli* including OXA-48 and OXA-48-like producers. Today, the selective isolation of ESBL/AmpC and/or carbapenemase-producing *E. coli* from the production of major terrestrial domestical food-producing animal populations and their derived meat serves as an indication of critical resistance and has demonstrated that it provides interesting complementary information to the monitoring of indicator commensal *E. coli* in particularly with the emerging occurrence of carbapenemase-producing *E. coli*.

7.2.2 | Isolation methods

It is proposed to continue with the isolation protocol provided by the EURL and already applied by the MSs for the isolation of ESBL- or AmpC- or CP-producing *E. coli* from seafood. The protocol is based on the principle of using a non-selective enrichment step without the supplement of neither a third-generation cephalosporin nor a carbapenem as the enrichment are also being used by the MSs for other parts of the monitoring. In brief, 25g of samples should be mixed with 225 mL of buffered peptone water (BPW) and incubated at 37°C±1°C for 18-22 h. Following incubation, one loopful (10 μL loop) of the pre-enrichment culture in BPW is applied by a single streak onto a MacConkey agar plate containing 1 mg/L of cefotaxime (CTX) and incubated at 44°C±0.5°C for 18–22 h. Based on the colony morphology of presumptive ESBL- or AmpC- or CP-producing *E. coli* colonies, up to three colonies should be subcultured onto new MacConkey agar plate containing 1 mg/L of CTX in addition to a suitable selective agar(s) for isolation of CP-producing *E. coli*. All agar plates should be incubated at 37°C±1°C for 18–22 h. Subsequently, growth of one of these subcultures should be species identified.

7.2.3 | Confirmatory testing and typing

As there is no harmonised isolation method for the ESBL- or AmpC- or CP-producing *E. coli* of the EU monitoring of AMR, MSs can applied both conventional microbiological and biochemical approaches as well as molecular and whole genome sequencing (WGS)-based methods.

7.2.4 | Antimicrobial susceptibility testing

It is proposed to continue with the previous recommendation for the use of standardised dilution methods for testing the susceptibility of ESBL- or AmpC- or CP-producing *E. coli* similar to indicator commensal *E. coli*. Thus, the BMD method according to the reference method ISO 20776-1:2019 and provided by the EURL-AR²³ shall be applied to test the susceptibility of and confirm the presence of ESBL- or AmpC- or CP-producing *E. coli* to the specified list of antimicrobials, with predefined appropriate dilution ranges and ECOFFs set out in Tables 4 and 5. The interpretation of the confirmation shall be in accordance with the EFSA Journal 2019;17(6):5709. It is of note that the use of this second plate may be replaced by using WGS, as a number of MSs already do.

TABLE 5 Panel of antimicrobial substances, EUCAST epidemiological cut-off values (ECOFFs) and clinical resistance breakpoints and concentrations ranges to be used for testing *E. coli* isolates resistant to cefotaxime or ceftazidime or meropenem.

Abbreviations: ECOFFs, epidemiological cut-off values; EUCAST, European Committee on Antimicrobial Susceptibility Testing; NA, not available. ^aEUCAST ECOFFs and CBs as in Decision (EU) 2020/1729. For the sake of consistency, the thresholds laid down in the legislation have been retained at this stage. Thresholds will be reviewed prior to the implementation of the BLS; further guidance will be provided by the EURL-AR and EFSA.

7.3 | **Laboratory methods for enterococci**

7.3.1 | Overview

The enterococci fulfil a useful and unique function among the organisms which are monitored by representing a common or frequent Gram-positive indicator organism which is not subject to the pressures from targeted control measures. Monitoring AMR in enterococci as indicator bacteria representing Gram-positive organisms will complement the data from *E. coli* is for Gram-negative bacteria (Enterobacteriaceae).

7.3.2 | Isolation methods

In the EU monitoring of AMR of enterococci, just as for the isolation of indicator commensal *E. coli*, there is no harmonised isolation method. It is, however, proposed to continue with the methodology already applied by the MSs for the isolation of enterococci in food using 25g of seafood mixed with 225 mL of buffered peptone water (BPW) and incubated at 37° C \pm 1°C for 18–22 h. Following incubation, one loopful (10 µL loop) of the pre-enrichment culture in BPW is applied by a single streak onto a Slanetz–Bartley agar plate and incubated at 37° C \pm 1°C for 48 h.

7.3.3 | Confirmatory testing and typing

MSs can applied both conventional microbiological and biochemical approaches as well as molecular, such as the EURL PCR protocol²⁴ and whole genome sequencing (WGS)-based methods.

7.3.4 | Antimicrobial susceptibility testing

It is proposed to continue with the previous recommendation for the use of standardised dilution methods for testing the susceptibility of enterococci similar to indicator commensal *E. coli*. Thus, the BMD method according to the reference method ISO 20776-1:2019 and provided by the EURL shall be applied to test the susceptibility of and confirm the presence of enterococci to the specified list of antimicrobials, with predefined appropriate dilution ranges and ECOFFs set out in Tables 5 and 6.

TABLE 6 Panel of antimicrobial substances to be included in AMR testing, EUCAST thresholds for resistance and concentration ranges to be tested in *E. faecalis* and *E. faecium.*

Abbreviations: CBP, clinical breakpoint; ECOFF, epidemiological cut-off value; NA, not available.

^aEUCAST ECOFFs and CBPs available as in Decision (EU) 2020/1729. For the sake of consistency, thresholds laid down in the legislation have been retained at this stage. Thresholds will be reviewed prior to the implementation of the BLS; further guidance will be provided by the EURL-AR and EFSA.

7.4 | **Laboratory methods for** *Aeromonas* **spp.**

7.4.1 | Isolation methods

Streaking samples on glutamate starch phenol red agar (GSP) (FAO, NParks and SFA, 2023) and incubation during 48h at 22°C. A first read could be done at 24h, but the colonies could be small. Incubation at 22°C during 48 h.

Select yellow colonies and purification step on ChromAgar or Nutritive agar (Tryptone Soy Agar or Muller Hinton Agar).

7.4.2 | Confirmatory testing and typing

The commercial identification systems (e.g. API 20E, Vitek, BBL Crystal, MicroScan W/A, among others) based on phenotypical reactions are not accurate for Aeromonas identification and confusions with Vibrio can occur (Chacón et al., 2002; Lamy et al., 2010; Soler et al., 2003). MALDI-TOF is also useful, and likely more practical in certain circumstances, for identification at the genus level (Fernández-Bravo & Figueras, 2020). Still, identification at the species level may be problematic, as underpinning database may not include the species of *Aeromonas* recently described (Pérez-Sancho et al., 2018).

Presumptive Aeromonas isolates identified during the BLS will be subjected to PCR assay, specific for the genus level. Gold standard method is based on the sequencing of housekeeping genes *gyrB* and *rpoD*. Confirmation of the identification at the genus level can be done by PCR targeting the conserved flanking regions of the gyrase B subunit (GyrB) gene (Khan et al., 2009) (Table 7).

TABLE 7 PCR assay.

7.4.3 | Antimicrobial susceptibility testing

MIC tests against *Aeromonas* are performed at 28°C with incubation for 44–48 h according to the protocols provided in the CLSI guideline VET03 (CLSI, 2020a). The inocula are prepared by the colony suspension method recommended this guideline VET03 using cation adjusted Muller−Hinton broth (CAMHB). The MIC values are determined by the microdilution method using CAMHB that was not supplemented with NaCl.

Each laboratory should employ one or both of the quality control (QC) reference strains *Escherichia coli* ATCC 25922 and *Aeromonas salmonicida* ATCC 33658 recommended by CLSI for this method (CLSI, 2020a). The CLSI document VET04 (CLSI, 2020b) provides acceptable ranges for these QC reference strains tested using the MIC protocol (Tables 8 and 9).

TABLE 8 Panel of antimicrobial substances to be included in AMR testing, interpretative thresholds for microbiological resistance and concentration ranges to be tested in *Aeromonas* spp.

Antimicrobial	Antimicrobial class	Interpretative thresholds of AMR (mg/L) (ref.)	Range of concentrations (mg/L) (No of wells)
Ampicillin	Penicillin	NA	$0.015 - 16(11)$
Ceftazidime	Cephalosporin	0.5(1)	$0.002 - 16(14)$
Enrofloxacin	Fluoroguinolones	$0.125(1$ and 2)	$0.0005 - 0.25(9)$
Florfenicol	Phenicols	2(2)	$0.03 - 16(10)$
Gentamicin	Aminoglycosides	2(2)	$0.06 - 8(8)$
Meropenem	Carbapenem	NA	$0.008 - 1(8)$
Oxolinic acid	Ouinolones	0.131(2)	$0.002 - 1(10)$
Oxytetracycline	Tetracyclines	$0.25(1 \text{ and } 2)$	$0.015 - 8(7)$
Trimethoprim-sulfamethoxazole	Folate pathway antagonist	$0.25(1$ and 2)	$0.008/0.15 - 1/19(8)$

Note: Ref.: (1) Lin et al. (2022); (2) Baron et al. (2017).

Abbreviation: NA, not available.

^aQC values are available for Microbroth dilution in Cation Adjusted Muller Hinton Broth and condition of incubation 28±°C during 24–28h – CLSI VetO4 (CLSI, 2020b) Table 4.

7.5 | **Laboratory methods for** *Vibrio parahaemolyticus* **and** *V. alginolyticus*

7.5.1 | Overview

To detect *Vibrio* spp. in a given sample, several successive analytical steps are needed. The first step is to isolate presumptive *Vibrio* spp. Screening and confirmation of *Vibrio* spp. are obtained by MALDI-TOF MS and PCR, respectively. Complementary analytical steps, antimicrobial susceptibility testing and WGS are performed to further characterise isolates.

7.5.2 | Isolation methods, confirmatory testing and typing

To ensure that the *V. parahaemolyticus* and *V. alginolyticus* prevalence assessed is comparable, the isolation procedure needs to be harmonised according to the ISO method. *V. parahaemolyticus* and *V. alginolyticus* are detected in four phases. The method recommended includes a pre-enrichment step followed by a second enrichment and an incubation on a chromogenic (CVA) and indicative agar plate (TCBS), followed by a confirmation:

Pre-enrichment increases the proportion of *Vibrio* in the samples (low numbers of *Vibrio* and abundant accompanying flora). Test samples (up to 25 g) are covered in 225 mL of alkaline peptone saline water (APSW) (preheated to 37° C \pm 1°C before inoculation with the test sample). The initial suspension is homogenised and incubated at 37° C \pm 1 $^{\circ}$ C for 6 \pm 1 h.

- **•** A 10 μL loopful of pre-enrichment culture is spread on two solid selective media plates: TCBS medium and a chromogenic medium, such as Chrom agar *Vibrio*, incubated at 37°C±1°C for 24±3 h.
- **•** On TCBS plate, presumptive *V. parahaemolyticus* colonies appear as smooth, green (sucrose negative) and of 2–3mm in diameter. Presumptive *V. alginolyticus* colonies appear as smooth, yellow (sucrose positive) and opaque. On Chrom agar *Vibrio* plate, presumptive *V. parahaemolyticus* colonies appear as mauve in colour, and presumptive *V. alginolyticus* colonies are colourless.
- **•** As the agar is not ultimately specific, presumptive colonies need to be carefully assessed and typed. Only typical *Vibrio*like colonies (according to the colours) should be used as mentioned. For confirmation, from each plate of each of the selective media, at least five colonies considered to be presumptive or similar to each of the vibrios being tested should be re-cultivated on either CVA or TCBS for purification and can be afterward subjected to MALDI-TOF MS for mass spectrometric analysis (screening). MALDI-TOF results will get better scores if freshly grown bacteria (16–26 h, 37°C). Only *Vibrio* species of interest, *V. parahaemolyticus* and/or *V. alginolyticus*, will be subjected to PCR confirmation using the designated PCRs.

It is of note that vibrios are very sensitive to cold and should not be stored at refrigeration temperatures. Otherwise, they should be kept there for a minimum period of time.

The workflow for isolation of *Vibrio* spp. is illustrated in Figure 1.

FIGURE 1 Flow chart for isolation and species confirmation of *V. alginolyticus* and *V. parahaemolyticus*.

7.5.3 | Antimicrobial susceptibility testing

The same methods and microplate as for *Aeromonas* spp. should be used (see Table 8).

7.6 | **Further typing and whole genome sequencing**

Whole genome sequencing (WGS) has already been implemented by several MSs for the specific monitoring of ESBL−/ AmpC−/carbapenemase-producing *E. coli* due to the strong added value and the potential of re-analysis in need of translating the data into action. Considering the inherent advantages in the WGS technology, it is proposed to use WGS within the BLS using the protocols developed by the EURL-AR for DNA extraction, DNA quality and quantity assessment, library

preparation, library quality and quantity assessment, WGS and assembly.²⁵ It is noteworthy to mention that it is not that important how the genome is produced but rather that the genome is of a high quality needed for the down-stream analysis as described in the EURL protocol.

7.6.1 | Multi-locus sequence typing

Sequencing typing of selected *E. coli*, *K. pneumoniae* and *enterococci* recovered during the baseline survey will be performed by determination of multilocus sequence type (MLST). MLST will be performed on selected isolates by deriving the sequence type from the WGS data. This will allow an assessment to be made whether these bacteria belong to lineages which may be associated with humans or belong to important human clones, such as *E. coli* ST131 possessing the ESBL enzyme CTX-M-15. Sequencing typing will also assist in determining whether the occurrence of these bacteria might be linked to anthropogenic pollution of surface waters as well as aiding possible assessment of public health significance.

7.6.2 | Whole genome sequencing for the detection of AMR and virulence genes

WGS will be performed on a subset of *E. coli*, *K. pneumoniae*, *enterococci, Aeromonas*, *V. alginolyticus* and *V. parahaemolyticus* isolates, representing the geographic and genetic diversity within each country. It is proposed that a proportion of 15% of isolates should be sequenced, with the additional rule that, within each stratum, at least one isolate and a maximum of 20 isolates should be sequenced. The objective is to perform sequence typing, species prediction and to search for genetic antimicrobial resistance (AMR) determinants, host adaptation and virulence. It could also be relevant to sequence isolates that are resistant to certain antimicrobials such as those determined as medical important drug classes (3rd- and 4th-generation cephalosporins, carbapenems, quinolones, macrolides, polymyxins, oxazolidinones, glycopeptides among others) or carry certain virulence genes (e.g. encoding α-haemolysin (*hlyA*), *fim*H adhesin in *E. coli* and for vibrios, *tdh* and *trh* among others).

The protocols to be used specifically in the BLS will be proposed by the EURL-AR. Quality assurance should address a number of mandatory quality checks²⁶ (Tables 8 and 10).

TABLE 10 Quality checks.

^aA quality score is an estimate of the probability of a base being called wrongly by the sequencer and it is calculated as: q=−10×log₁₀(p).

25https://www.eurl-ar.eu/CustomerData/Files/Folders/34-wgs/628_protocol-for-wgs-v2-2.pdf.

26[https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/sp.efsa.2022.EN-7413.](https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/sp.efsa.2022.EN-7413)

7.6.3 | Bioinformatics analysis

Analysing WGS data, several bioinformatic tools/pipelines are available to detect and characterise AMR traits, of which AMRFinderPlus, ResFinder and CARD (Comprehensive Antibiotic Resistance Database) are recommended by the EURL-AR. Various strategies can be used to perform genotypic determination of AMR genes and to predict AMR profiles as described in the EFSA Journal 17(6):5709 (EFSA, 2019).

To ensure a harmonised computational approach in the detection of AMR genes, its pivotal to search for AMR genes from the same AMR gene catalogue developed by the EURL-AR and EFSA. Thus, the MSs are encouraged to search several of the recommended bioinformatic tool(s)/pipeline(s) to detect the AMR genes listed in the AMR gene catalogue. It is important to note that not all the recommended bioinformatic tool(s)/pipeline(s) contain all AMR genes of the catalogue due to lack of curation; thus, the MSs need to ensure the AMR genes of the catalogue being present in the used bioinformatic tools/pipelines.

Bioinformatics analyses include determining a number of mandatory genotypic characteristics such as multilocus sequence typing (MLST), detection of AMR genes and chromosomal point mutations and detection of other genes associated with host adaptation and virulence (Table 11).

Complementary information will be provided by the EURL-AR to the MSs, as needed, while preparing for the implementation of the BLS so that the MSs can spread the testing all along the year of the survey.

TAB LE 11 Genotypic characteristics of interest.

7.7 | **Storage of strains**

Isolates verified as *E. coli*, *Aeromonas* spp., *V. parahaemolyticus*, *V. alginolyticus* and enterococci should be saved and stored under conditions not allowing changes in their properties at −80°C at least for 5years. This is to allow, for instance, later testing for antimicrobial susceptibility or other types of characterisations if requested by the EFSA or for research or other purposes at a national or European level. Isolates sent to the EURL-AR will also be stored for a minimum of 5years.

8 | **DATA REPORTING**

8.1 | **Overall description on the implementation of the BLS**

Three sets of data are to be reported to cover all information collected during sampling and analysis:

- **•** Prevalence sample-based data model: It includes detailed analytical results of all samples taken (whether positive or negative) reported using the EFSA standard for reporting laboratory results: Standard Sample Description version 2 (SSD2).
- **•** AMR isolate-based data model: It includes isolate-level quantitative antimicrobial resistance and WGS data reported according to the antimicrobial resistance (AMR) data model of EFSA.
- **•** Population data model: Annual throughput of slaughterhouses involved in the survey and fish population size of the farms of origin.

The laboratory isolate code is to be used to link the data reported in the prevalence sample-based (SSD2) data model with those reported in the AMR isolate-based data model. The slaughterhouse identification code and the holding identification code will be used to link the analytical results of sampled to the population data model.

Potential slight alterations and supplements to the data reporting model may still occur while implementing it at EFSA and they will be communicated to the reporting countries considering the appropriate time for implementing them.

8.2 | **Prevalence sample-based data**

The EU MSs/participating countries can use the SSD2 data model to report sample-based zoonoses and zoonotic agent data to the data collection system of EFSA. Specific guidance to report information under the framework of Directive 2003/99/EC, Regulation (EU) 2017/625, Commission Implementing Regulation (EU) 2019/627 and of Commission Delegated Regulation (EU) 2018/772 is published annually by EFSA. Analytical results for BLS samples and some additional information will be requested in the context of the BLS will be reported to the EFSA's data collection system (Table 12).

The full list of data elements relevant for the BLS is presented below together with the default (fixed) value to be used in the context of the BLS, where applicable. The detailed description of all the data elements will be found in the prevalence sample-based guidance (EFSA, 2022).

The sampling unit for the BLS is the batch (fish/mussels/PA), and therefore, all elements at the sampling unit level (e.g. sampEventId) refer to a batch sampled at a given time in a given farm/slaughterhouse/dispatch centre.

The data will be reported at the level of the individual analytical results, e.g. if one pooled sample undergoes only one test for screening in the laboratory, one line will be reported for this sample, but if the screening test is positive and the samples undergo further testing, one additional line will be reported for each additional test. As a result, several lines will be reported per batch (at least one line per pooled sample) and possibly several lines will be reported per pooled sample. In this context, each analytical results can be reported with the exact date on which it was performed.

8.3 | **AMR isolate-based data**

MSs can use the AMR data model to report isolate-level quantitative antimicrobial resistance and WGS data to the data collection system of EFSA. Guidance to report such data under the framework of Directive 2003/99/EC and Commission Implementing Decision 2020/1729/EC is published annually. Isolate-level quantitative antimicrobial resistance results for bacteria targeted samples can already be reported to the EFSA's data collection system following the instructions provided there.

In the context of the BLS, the data model will be extended to receive WGS results of the targeted bacteria isolates. The full list of data elements is presented below together with the default (fixed) value to be used in the context of the BLS, where applicable (Table 13). The detailed description of all the data elements will be found in the guidance to be drafted for the purpose of the BLS.

8.4 | **Population data**

To improve the analysis that will be performed with the BLS data, MSs are requested to provide information about the fish population in the involved slaughterhouses/farms and in the farms of origin of the sampled slaughter batches. In particular, they should report the annual throughput of each slaughterhouse/farm and the number of animals in each PU of origin following the data model in the table below. This data model described below (Table 14) is a simplified version of a data model developed by EFSA to report animal population at the establishment level (EFSA, 2022).

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Note: Mandatory* are optional in the schema (XSD file), but mandatory to be reported in certain circumstances (described in the business rules).

TABLE 13 EFSA data model for isolate-based antimicrobial resistance data reporting.

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Note: Mandatory* are optional in the schema (XSD file), but mandatory to be reported in certain circumstances (described in the business rules).

TABLE 14 EFSA data model for animal population data reporting.

Note: Mandatory* are optional in the schema (XSD file), but mandatory to be reported in certain circumstances (described in the business rules).

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ABBREVIATIONS

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CONFLICT OF INTEREST

If you wish to access the declaration of interests of any expert contributing to an EFSA scientific assessment, please contact interestmanagement@efsa.europa.eu.

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APPENDIX A

Protocol for designing technical specifications for a BLS on AMR in aquaculture animals

A.1 | INTRODUCTION

A.1.1 | Introduction and scope of this protocol

This document outlines the protocol developed for the assessment to be performed for the EFSA Scientific Report on the technical specifications for a BLS on AMR in aquaculture animals.

The aim of this document was to define the methods for collecting data, appraising the relevant evidence and analysing and integrating the evidence in the light of the identified uncertainties. It was developed following the principles and process defined in a project that aimed to further improve EFSA's scientific assessment processes and based on the recommendations for protocol development described in the draft framework for protocol development for EFSA's scientific assessments.

The protocol was drafted by the WG.

A.1.2 | Terms of Reference (TOR) as provided by the requestor

The European Commission requests scientific and technical assistance from EFSA to provide technical and scientific support for the development of a baseline survey as regards AMR in aquaculture animals considering the most recent scientific literature and technological developments, epidemiological trends and relevance for public health.

In particular, EFSA is asked to propose harmonised approaches for the collection and the analysis of AMR situation in aquaculture animals by:

- **–** proposing priority combinations of aquaculture animals/target bacteria to be considered in the BLS;
- **–** proposing a complete sampling framework for the implementation of the BLS including the origins of bacterial isolates subject to AMR testing, the sampling design and the sample size;
- **–** proposing protocols for isolation and characterisation of bacteria;
- **–** proposing protocols for phenotypical antimicrobial susceptibility testing of bacterial isolates;
- **–** proposing protocols for the testing of bacterial isolates via molecular typing methods;
- **–** providing guidance for technical reporting of the BLS data collected by Member States to EFSA.

A.2 | PROBLEM FORMULATION

A.2.1 | Assessment questions based on the interpretation of the mandate

Step 1 consists of the translation of the mandate into assessment question(s) (AQs) (step 1.1) and the definition of the subquestions (SQs) (step 1.2) of each assessment question and their relationship (conceptual model) where appropriate. Table A.1 provides, for each of the ToR, the translation of the mandate into AQs as included in the second column (step 1.1). For the current mandate and protocol, as the AQs were already narrow, there was no need to further split them into SQs, as indicated in the third column (step 1.2).

The approach for each AQ, i.e. whether to apply a quantitative, qualitative or semi-quantitative approach, has been specified in the fourth column (step 1.3).

A.3 | METHODS FOR CONDUCTING THE ASSESSMENT

The second step includes the overall approach (step 2.1) as well as the evidence needs and the methods (step 2.1) for answering each AQ including uncertainty analysis (i.e. the use of a literature review, data from databases, expert judgement or primary data collection). Table A.1 provides this information in the fifth and sixth columns.

Step 2.2 (defining the methods for integrating evidence across subquestions) is not applicable for this protocol as no SQs have been defined.

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TABLE A.1 Assessment of questions to propose harmonised approaches for the collection and the analysis of AMR data in bacteria from aquaculture animals.

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APPENDIX B

Aquaculture production data of fishery products in Europe in 2021

Aquaculture involves the controlled cultivation of fish, molluscs and crustaceans. In 2021, an estimated 1.1 million tonnes of aquatic organisms were farmed in the EU,²⁷ valued at €4.2 billion. Four EU Member States accounted for more than twothirds (68%) of the total production of farmed aquatic organisms in 2021: Spain 25%, France 17% and both Italy and Greece 13%. Aquaculture production within the EU was lower than that in Norway, where 1.6 million tonnes of aquatic organisms were produced, most of which was farmed salmon (Figures B.1–B.3).

Production in the EU is focused primarily on finfish species (such as trout, seabream, seabass, carp, tuna and salmon) and molluscs (including mussels, oysters and clams), which together accounted for almost all the aquaculture production by weight in 2021. Different aquatic organisms command different prices. The production value of trout and seabass in 2021 was higher than other species in the EU (each accounting for a 14% share of the total value of the EU's aquatic farming in 2021).

Regarding shellfish aquaculture production, mussel is produced in 13 MSs, considering together the species blue mussel and Mediterranean mussel. Four MSs (ES, FR, IT, NL) produce nearly 90% of the EU production of mussels.

Regarding marine finfish production, the production of seabass is reported in eight MSs (HR, CY, EL, IT, MT, PT, SI, ES) and the production salmon is reported in three MSs (IE, FI, SE) and in NO. Norway is by far the main producer of salmon in Europe.

Regarding freshwater finfish production, the production of varying kinds of trout is reported in 23 MSs as well as in Norway and Iceland, considering together the rainbow trout, brook trout, sea trout. Norway is by far the main producer of trout in Europe. It is also of note that some sea trout are produced at sea and should therefore not be considered within the part of the BLS on freshwater finfish (e.g. in DK, SE, FI or FR) but may be considered within the framework of the sampling of marine finfish production, on a voluntary basis.

FIGURE B.3 Distribution of trout production among EU/EFTA Member States (%), EUMOFA 2021.

Northern Ireland: In accordance with the Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community, and in particular Article 5(4) of the Windsor Framework in conjunction with Annex 2 to that Framework, for the purposes of this report, references to Member States include the United Kingdom in respect of Northern Ireland.

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APPENDIX C

Outcome of the literature review on *E. coli* **and enterococci**

TABLE C.1 Studies investigating the occurrence of AMR in *Escherichia coli* in shellfish and finfish produced in Europe.

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TABLE C.2 Studies investigating the occurrence of AMR in *Enterococcus* sp. in shellfish and finfish produced in Europe.

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TABLE C.2 (Continued)

APPENDIX D

The required sample sizes (number of isolates) at the EU level

Table C.2 below provides the required sample sizes, i.e. the number of isolates to be tested for susceptibility at the EU level, for a grid of values for $p_{_{r'}}$ for confidence levels 0.80 and 0.95, and for three values for accuracy²⁸ a. The required numbers of isolates after adjustment, i.e. further inflated by 5% to consider a 5% occurrence of possible missing data and by 2% to account for the possible loss of strains during storage, are also shown in Table C.2 below.

For example, suppose a confidence level of 0.95 is chosen and suppose several literature studies across different MSs provide prevalence-estimates in the range of (0.05, 0.26). Using the value 0.3 (closest to the upper limit of the confidence interval, leading to a 'conservative' choice) and assuming this holds for the whole EU, we get the required numbers 25, 86 and 328 for accuracy 0.2, 0.1 and 0.05, respectively. For a confidence level of 0.95 and $p_r=0.3$, the required adjusted numbers equal 27, 92 and 351 for accuracy 0.2, 0.1 and 0.05, respectively (Table D.1).

TABLE D.1 The required number of isolates **niso**, corresponding to different choices of accuracy *a*, confidence, and for different values of the unknown occurrence of AMR \bm{p}_r Left number: Before loss adjustment, right number, with loss adjustment (i.e. +5% for missing data and +2% for loss of strain during storage).

APPENDIX E

Sample batch sensitivity

TABLE E.1 Sample batch sensitivity *BSe* as a function of the intra-batch correlation parameter ρ , the size of the sample batch *m*, the within PB prevalence *𝝅***wbp**.

APPENDIX F

Estimation of prevalence π_{bp} **, within PB prevalence** π_{wbp} **, intra-batch correlation parameter** ρ **and batch sensitivity** *BSe*

F.1 | ESTIMATION OF PREVALENCE π_{bp} , WITHIN PB PREVALENCE π_{wbp} INTRA-BATCH CORRELATION **PARAMETER** ρ

The data concern batch samples of gills of freshwater trout (Salmonidae) from France, tested for *Aeromonas* spp. More precisely, 20 batches of size 10 were tested for *Aeromonas* spp. and resulted in the following total number of positive fish:

4, 4, 5, 4, 5, 1, 4, 8, 1, 2, 8, 8, 9, 8, 8, 3, 2, 5, 4, 1.

As all batches have at least one fish tested positive, the observed prevalence π_{bp} equals 1. A Wilson 95% confidence interval for the proportion 20/20 is given by (0.84, 1). We suggest using the midpoint 0.92 as estimate for the prevalence π_{bn} (instead of the boundary value 1).

The beta-binomial model was fitted to the 20 proportions, leading to the following estimates (rho refers to the intrabatch correlation and pi to the within PB prevalence).

The PB prevalence π_{wbo} is estimated as 0.47 with 95% CI (0.35, 0.59) and the intra-batch correlation parameter ρ as 0.18 with 95% CI (0.04, 0.31).

The results were generated using SAS software (code in *Proc nlmixed*). Copyright © 2020 SAS Institute Inc. SAS and all other SAS Institute Inc. product or service names are registered trademarks or trademarks of SAS Institute Inc., Cary, NC, USA.

F.2 | ESTIMATION OF BATCH SENSITIVITY *BSE*

As an example, consider a batch of size 5. We assume test sensitivity and specificity to be very high (and taken as 100%). Based on the beta-binomial distribution for clustered binary data, the batch sensitivity *BSe* equals (with *yi =0* denoting that the *I* -th fish is tested negative).

$$
BSe = 1 - P(y_1 = 0, y_2 = 0, y_3 = 0, y_4 = 0, y_5 = 0).
$$

$$
= 1 - \left(1 - \pi)(1 - \pi + \pi \rho)\left(1 - \pi + \frac{2\pi\rho}{1 + \rho}\right)\left(1 - \pi + \frac{3\pi\rho}{1 + 2\rho}\right)(1 - \pi + \frac{4\pi\rho}{1 + 3\rho}\right),
$$

with π denoting the within PB prevalence and ρ the intra-batch correlation. A similar extended formula holds for a batch of size 15.

Taking $\pi = 0.5$ and $\rho = 0.2$ the batch sensitivity for a batch of size 15 equals *BSe* = 0.98, as shown in Table D.1. For $\pi = 0.47$ and $\rho = 0.18$, the batch sensitivity for a batch of size 5 equals $BSe = 0.88$, as used in Appendix G.

APPENDIX G

Illustration for combinations: Freshwater trout and Atlantic salmon with *Aeromonas* **spp.**

G.1 | PRINCIPLES

An overview of general principles and choices for unknown parameters, applied to both cases of trout and salmon is presented below.

- **• Stratified sampling** with EU/EFTA Member States/regions as strata
- **• Proportional allocation** using relative production volumes of strata
- **• Production batches** are the epidemiological units to be sampled
- **•** For the estimation of the **occurrence of resistance at the EU level**, the **required number of isolates** is based on the following parameters:
	- ⚬ Accuracy 0.05 (leading to a confidence interval of length at most 0.1)
	- ⚬ Confidence level 0.95
	- \circ Taking the unknown occurrence of AMR as 0.5²⁹
	- ⚬ Extra 5% for missing observations
	- Extra 2% for losses³⁰
	- Quarterly³¹ measurements on the same production unit
	- \circ Correlation 0.2³² of observations from the same production unit.
- **•** The conversion to the **required number of production batches** (PBs) is based on:
	- ∘ Batch of size $\geq 5^{33}$
	- ⚬ Batch prevalence 0.92, within-batch prevalence 0.47, intra-batch correlation 0.18 (see Appendix F)
	- ⚬ Test sensitivity and test specificity were assumed to be very high (and taken as 1), resulting in a batch sensitivity *BSe*=0.88.
	- ⚬ These values were applied **to all strata**. If different estimates are available for different strata, they could be used for each stratum separately.
	- ⚬ As the required number of production batches (PBs), or the required number of production units (PUs) (being the number of PBs divided by 4, given 4 quarterly measurements from the same PU) can be extremely small (say 1 PU) or extremely large for some strata, depending on the relative production volumes, a truncation with a **minimum** and **maximum number of PUs** for any stratum (MS or region) was applied, based on:
		- For the **minimum**: Estimating the AMR occurrence with an accuracy of only 0.2 and a confidence level of only 0.80, and zero intra-PU and intra-batch correlation (leading to the smallest sample sizes). This leads to a **minimum** of **4 PUs** or **16 PBs per MS**.
		- For the **maximum**: Estimating the AMR occurrence with an accuracy of 0.1 and a confidence level of 0.95, and intra-PU and intra-batch correlation as applied during the sample size calculations. This leads to a **maximum** of **53 PUs** or **212 PBs per MS**.

G.2 | FRESHWATER TROUT: MS AND REGIONS WITHIN FRANCE AS STRATA

Using the total production volumes (last column in the table below) and including Iceland, Norway and Switzerland (source: STECF-22-17 report).

 29 Taking an occurrence of AMR of 0.6 is the worst case leading to the widest interval.

³⁰Such as loss of strains during storage.

³¹ Approximately every 3 months.

 $32\text{We assume a small but still impactful value of 0.2, based on the example presented in the Appendix F.}$

³³ Because 5 fish are sampled and tested per production batches.

(Continued)

Stratum 'France' was split further in regional strata according to the production volume column in the table below (Agreste).

Table Aquaculture production for consumption of freshwater salmonids in France in 2020, by region (of the seat of the undertaking), hatchery/nursery excepted (source: Agreste).

To exclude very small regions in France. Only the largest regions accumulating at least 60% of the total production of France were included as strata.

Table G.1 below shows in the different columns:

(i) The EU/EFTA Member States and regions for France (the strata);

- (ii) The relative production percentages;
- (iii) The required number of isolates: when unadjusted: 388, when adjusted for missingness and losses: 416, when additionally adjusted for multiple isolates from the same PU (production unit): 665, with rounding to integers (across the strata): 677; (iv) The required number of production units: the number of batches as multiples of 4 divided by 4;
- (v) The required number of PBs (production batches): adjusting the number of isolates by dividing by the batch prevalence 0.92 and the batch sensitivity 0.88 (factor 1.23); next turned into multiples of 4. For example, for Italy, the number of PBs
- is $74/(0.92 \times 0.88) = 92$ (rounded up) and the number of production units is $92/4 = 23$;
- (vi) The required number of PUs (production units) with minimum 4 and maximum 53;
- (vii) The required number of PBs (production batches) with minimum 16 and maximum 212;
- (viii) The totals in the last row.

TABLE G.1 Sample size calculations for freshwater trout.

G.3 | ATLANTIC SALMON: MS AS STRATA

The design for Atlantic salmon is illustrated below, using the same parameter values as for freshwater trout, and taking into account very skewed production volumes, as 98% of the European production of Atlantic Salmon is produced in Norway. Note how the untruncated required number of 804 production batches for Norway is truncated to its maximum of 212 batches. Consequently, the required accuracy of 0.05 is not guaranteed at the EU level, but the required accuracy of 0.1 at the MS level is also guaranteed at the EU level.

^a Sea trout.

Table G.2 shows the results. All sample size numbers were truncated due to the extremely skewed production volume distribution. Indeed, Norway exceeds, with a number of 201 required PUs (column 3), STECF-22-17 the maximum number of 53 PU by far and is truncated on the maximum of 53 in column 5. All other countries have very low required numbers of PUs, varying from 1 to 3 and are all truncated upwards to 4 (in column 5). So, the truncation has a huge effect in this very extreme case. The initial total of 840 production batches has been reduced to 292.

Country	Country relative production	No. isolates	No. production units	No. production batches	Truncated no. production units	Truncated no. production batches
Finland	0			4	4	16
Ireland	0.009		3	12	4	16
Sweden	Ω			4	4	16
Iceland	0.01		3	12	4	16
Norway	0.981	652	201	804	53	212
Switzerland	$\mathbf{0}$			$\overline{4}$	$\overline{4}$	16
Total		669	210	840	73	292

TABLE G.2 Sample size calculations for Atlantic salmon.

