

(Attachment)

Japan's Comments on the Report of the Meeting of WOAH Aquatic Animal Health Standards Commission (September 2025)

(Annex 9. – Proposed approach to revision of Section 5 ‘Trade measures, importation/exportation procedures and health certification’)

Comments

In Japan, Health certificates for aquatic animals are issued by officers in fisheries departments of local governments which are responsible for aquatic animal disease prevention and control.

We acknowledge that the proposal of Terrestrial Code Annex 8 Article 5.4.2 encourages to limit export procedures only through Veterinary Authority. In addition, the proposal in Terrestrial Code Annex10 Article 5.6.3 mentions that international veterinary certificates may only be issued by the Official Veterinarian. (underlined portion).

However, fisheries departments of Japanese local governments which are responsible for aquatic animal disease prevention and control also can confirm the sanitary conditions of aquatic animals through officers who are experts in aquatic animal health. In addition, the health certificates issued by Japanese local government can be used for safe and sound import/export. Taking into account this situation, health certificate in Aquatic code should be issued by not only veterinarians but also officers who are experts in aquatic animal health in fisheries departments of local governments which are responsible for aquatic animal disease prevention and control.

Furthermore, we request that the name of the health certificate be changed from “international veterinary certificate” to “international aquatic animal health certificate” as per the Aquatic code.

The Terrestrial Animal Health Standards Commission annex8

Article 5.4.2 General considerations

The **Veterinary Authority** should ensure operators are aware of the importing country requirements, if they are available to the **Veterinary Authority** in accordance with Chapters 5.1. and 5.2. In addition, the **Veterinary Authority** should make operators aware of the processes required to meet the conditions of the **international veterinary certificate** including the importing country requirements.

The **Veterinary Authority** should be responsible for the implementation of official controls in coordination with other relevant Competent Authorities in accordance with **veterinary legislation** to ensure that exported commodities meet the importing country requirements. The legal mandate and responsibilities of the **Veterinary Authority** and other relevant Competent Authorities should include the official controls at any step in the export process and the opportunity to request from the operator any necessary information. Where appropriate, the **Veterinary Authority** and other relevant Competent Authorities may delegate certain tasks. Adequate human, technical, physical and financial resources should be available in the exporting country for the **Veterinary Services** to effectively implement official controls and to properly apply the certification obligations and procedures laid down in Chapters 5.1. and 5.2., in accordance with the quality principles in Chapter 3.2.

The **Veterinary Authority** should cooperate closely with all relevant authorities, including customs and other law enforcement authorities of the exporting country dealing with exports to ensure that official controls are implemented effectively and to maintain compliance of the commodities with importing country requirements. This cooperation should also cover actions to prevent and combat fraud or illegal pathways.

The **Veterinary Authority** should have procedures, as applicable, for certification of the animal health status of the herd/flock, compartment, zone, or country as well as of the disease situation in establishments and other premises and communicate with the operator regarding any additional documentary evidence that may be required to support such certification.

The **Veterinary Authority** should ensure that the applicable certified animal health status of the herd/flock, compartment, zone, or country, is based on appropriate surveillance and reporting in accordance with Chapter 1.4.

The Veterinary Authority or other relevant Competent Authorities should have procedures for registration and approval of establishments of origin, where applicable, and other facilities used for production and handling of consignments, to comply with the **international veterinary certificate**. Operators should not hinder access by the **Veterinary Authority** to the commodities, the premises where they are located and the means **of transport**. During official controls, operators should assist and cooperate with the Veterinary **Services** and make available all **relevant** information concerning the consignment.

The **Veterinary Authority** should have procedures for the **international veterinary certification** of sanitary conditions of individual animals.

The **Veterinary Authority** should ensure that appropriate identification of commodities is in place to support traceability of the consignment to comply with its **international veterinary certificate**. Animal identification should be in accordance with Chapter 4.2. and Chapter 4.3.

Upon request from the **Veterinary Authority** of the importing country or from the **Veterinary Authority** of a transit country, the **Veterinary Authority** should provide additional information on the process to ensure compliance with the conditions included in the **international veterinary certificate**, and undertake investigation and reporting, or give reasonable access for audit in case of repeated non-compliant consignments. The **Veterinary Authority** should ensure that the commodities remain

compliant before and during transport to the point of exit. The exporting country should suspend the export of a commodity when there is reason to believe that it may present a risk to animal health or public health or if it does not comply with the **international veterinary certificate**.

The **Veterinary Authority** should promptly communicate to the **Veterinary Authority** of the importing country, and any transit country, any change of situation, such as a change of the animal health status, that may affect its capacity to certify the conditions of the **international veterinary certificate**.

The **Veterinary Authority** should also inform without delay the **Veterinary Authority** of the importing country and, where necessary, the transit country in the event that a particular issue such as the occurrence of a listed disease or a disease referred to in the importing country requirements which may affect compliance of a commodity which has already left the exporting country. This information should be part of the relevant emergency response plan developed in accordance with Chapter 4.19.

In case of animals, operators should ensure that animal welfare is maintained throughout the export process in accordance with Section 7 as relevant.

The **Veterinary Authority** should carry out collaborative activities with other relevant Competent Authorities, customs and other law enforcement authorities, and operators, and with **Veterinary Authorities** in other countries, to control the risk posed by illegal or informal cross-border movement of commodities, e.g. the international movement of commodities done in a way that avoids official controls intentionally (illegal) or that may be unregulated but may present risks (informal).

The Terrestrial Animal Health Standards Commission annex10

Article5.6.3

(Omitted)

a) Documentary check

A documentary check should be implemented on all consignments presented for official controls to ensure that they meet the *importing country* requirements.

A documentary check should include examination of the **international veterinary certificate**, and possibly of laboratory reports or other documents, including those of a commercial nature, which are required to accompany the consignment.

When implementing a documentary check, the **Veterinary Services** should inspect the required documents, in original or their digital equivalents as agreed between the importing and *exporting country*, to ensure that:

- i) the **international veterinary certificate** has been issued by the **Official Veterinarian** of the exporting country; complies with relevant principles set out in Article 5.2.3. and corresponds as relevant to the model established by the importing country or agreed between the exporting and the importing country for that *commodity* and intended use; and

(Omitted)

(Annex 18. Item 8.2.4. Chapter 2.4.6. ‘Infection with *Perkinsus olseni*’、P240)

Regarding the notation for *Perkinsus olseni*, please remove the dot of ‘*Perkinsus. olseni*’ in “1. Scope”.

(Chapter 2.2.6. Infection with infectious Myonecrosis virus、P273)

Regarding the notation for the infectious myonecrosis virus, please change the family and genus names of the virus to italics in “1. Scope” and “2.1.1. Aetiological agent”.