Japan's Comments on The Terrestrial Animal Health Standards Commission Reports of the September 2020 meeting

Japan would like to express its appreciation to the Terrestrial Animal Health Standards Commission (TAHSC) and other relevant Commissions, Working Groups and ad hoc Groups for all the works they have done. Japan also appreciates the TAHSC for providing us with the opportunity to comment on the proposed revisions to the texts of Terrestrial Animal Health Code.

Please find our comments on the following texts and Annex:

Contents

1. CHAPTER 4.4. ZONING AND COMPATMENTALISATION

1) Proposal of amendment to Article 10.4.4.6. (insertion/~~deletion~~)

Article 4.4.6.

Protection zone

Increased *surveillance* in accordance with Chapter 1.4. and the relevant disease-specific chapter, should be implemented in the protection zone and the rest of the country or zone, including *surveillance* of wildlife and vectors as relevant.

Establishment of the *protection zone as a temporary measure* within free country/zone should be declared by Veterinary Authority and may be maintained up to 24 months. Boundaries of the protection zone should be determined at the time of the establishment and made to public.

Rationale

Japan does not agree with the Code Commission's opinion on maximum duration for the protection zone should be specified only for disease for which the OIE grants official recognition. When a protection zone is temporarily established within free country/zone in response to an elevated risk of disease, one of the following events is expected to be occurred.
1) the zone will be lifted as soon as the risk is mitigated
2) the zone will become an infected zone as a result of the disease incursion
3) the zone will become a containment zone as a result of the disease incursion followed by containment within the zone
If none of the events above occurred, but protection zone cannot be lifted due to the continuous risk, established protection zone cannot be considered as a temporary measure.

Japan also would like to reiterate that even if the protection zone is established as a temporary measure, the zone should meet the requirements to be applied for the 'ordinary' protection zone such as strict movement control between a protection zone and the rest of the country in accordance with relevant code provisions. Thus, it is critical that the boundaries of the protection zone are clearly defined at the time of establishment and made to public to ensure necessary movement control.

In conclusion, Japan believes maximum duration for the protection zone established as a temporary measure should be specified (e.g. 24 months) regardless of the official recognition and the establishment of such protection zone and its boundary should be declared by the veterinary authority of concern.

2. CHAPTER 8.8. INFECTION WITH FOOT AND MOUTH DISEASE VIRUS

1) General Comment

Japan would like to express our concern again that overhaul of this chapter seems to promote use of vaccine in FMD prevention and control rather than pursuing FMD eradication by adding new provisions to reduce the impact of vaccination on disease free status. Although vaccine is one of the strong tools in disease control, the OIE should remind that, based on PCP, the ultimate goal is to achieve FMD free without vaccination and thus use of vaccination should be restricted to emergency measures and vaccination on permanent basis should be discouraged.

2) Comment on Article 8.8.1.bis

Article 8.8.1.bis

Safe commodities

When authorising import or transit of the following commodities, Veterinary Authorities should not require any type of FMD-related conditions regardless of the FMD status or zone

1) UHT milk and derivatives thereof,

2) meat in hermetically sealed container with a F0 value of 3 or above,

3) meat and bone meal and blood meal

4) gelatine,

5) in vivo derived embryos collected processed and stored in accordance with Chapter 4.8

Other commodities of susceptible species can be traded safely if in accordance with the relevant articles in this chapter.

Comment

Regarding the ongoing discussion on seeking for the possibility of including ‘fresh boneless ruminant meat’ as a safe commodity, Japan express opposition because in order to inactivate FMDV in bovine meat, prior to deboning, meat has to be subjected to maturation at a temperature greater than +2℃ for a minimum period of 24 hours following slaughter and in which the pH value was less than 6.0 when tested in the middle of the longissimus muscle according to the Article 8.8.22. Such procedure, especially testing every carcass to ensure a certain pH value is achieved, cannot be considered as globally standardised industrial processes in every country in the world. In addition, virus inactivation through maturation in ruminant meat other than bovine should be scientifically demonstrated before incorporated in the code. Thus, Japan considers boneless ruminant meat should not be included in the safe commodities.

3. CHAPTER 10.4. INFECTION WITH HIGH PATHOGENICITY AVIAN INFLUENZA VIRUSES

1) General comment

Japan appreciates the Code Commission's reasonable approach to leave LPAI with zoonotic potential with severe consequences in the OIE list by taking into account the comments concerning zoonotic implication of LPAI. Japan also noted the Code Commission's explanation that while decision to determine the impact and severity of zoonotic LPAI is pending, Members can respond to the event by considering as 'emerging disease'. Japan concerns the notification attitude may vary among Members and may cause underreporting. Thus, Japan suggests the OIE to inform all Members to notify one specific LPAI subtype with zoonotic potential as emerging disease in case the OIE received the first notification of that particular AI as an emerging disease from a Member. Information collected will help understanding the disease epidemiology, raising awareness in human population and subsequent determination for listing as "LPAI having proven natural transmission to humans associated with severe consequences".

It was already done by the OIE for SARS-COV2 infection in animals for which OIE has sent a clear message to Members to notify any detection of SARS-COV2 in animals as an emerging disease by providing guiding document. Accumulated scientific evidence and case reports provided better understanding of the impact of this virus in Animals and supported developing scientifically sound measures.

In addition, Japan has been insisting that the OIE should keep collecting and analysing information about the occurrence of LPAI to allow for better preparation for the future zoonotic events. Japan notes that OFFLU works as a platform for exchanging scientific data and biological materials among animal influenza experts, however, even in OFFLU platform, recent LPAI outbreak information mainly relies on OIE WAHIS which gathers information collected through notifications from veterinary authorities of Members. Thus, OIE should encourage Members to report LPAI occurrence as 'other important animal health information' in accordance with Article 1.1.6.

4. CHAPTER 11.4. BOVINE SPONGEFORM ENCEPHALOPATHY

1) Comment on Article 11.4.10.

Article 11.4.10.

Recommendations for importation of fresh meat and meat products from a country, zone or compartment posing a negligible or controlled BSE risk

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that:

AND EITHER:

3) they were born in the country, zone or compartment during the period when the risk of the BSE agents being recycled in the cattle population has been demonstrated to be negligible;

OR

4) the fresh meat and meat products:

a) derived from cattle not subjected to a stunning process with a device injecting compressed air or gas into the cranial cavity, or to a pithing process, or to any other procedure that can contaminate blood with nervous tissue, prior to slaughter; and

b) were produced and handled in a manner which ensures that such products do not contain and are not contaminated with:

i) the commodities listed in points 1) of Article 11.4.14.;

ii) mechanically separated meat from the skull nor from the vertebral column from cattle over 30 months of age.

Comment

Japan believes the proposed amendment referring to the risk of recycling of BSE agents for each cattle regardless of the BSE risk status is scientifically sound. At the same time, the revision affects practical aspects on international trade of cattle and products derived from cattle. For example, since BSE risk of individual cattle or product cannot be determined by country/zone level risk status alone according to the proposed amendments, information such as ‘the period when the risk of the BSE agents being recycled in the cattle population has been demonstrated to be negligible’ should be clearly specified by the exporting country. This revision affects quarantine procedures in importing country and certain transition period may be needed.

2) Comment on Article 11.4.18.

Article 11.4.18.

Surveillance

2) Surveillance for BSE consists of the reporting of all animals that lie on the continuum of the BSE spectrum to the *Veterinary Authority* for subsequent investigation and follow-up.

Comment

Since only passive surveillance will be required according to the proposed amendment, capacity of veterinary service for ensuring reporting of every suspected cases to the veterinary authority is critical. Without robust reporting system in place, passive surveillance may not be sufficient to detect every classical and atypical BSE case reliably.

Therefore, it is critical to assess the quality and reliability of passive surveillance itself when granting the BSE status and thus Japan believes the Scientific Commission should establish criteria for assessing passive surveillance system in Members applying for the BSE risk status as well as the result of the passive surveillance submitted.

5. CHAPTER 12.2. INFECTION WITH Taylorella equigenitalis (Contagious equine metritis)

1) Proposal of amendment to Article 12.2.1. (insertion/~~deletion~~)

Article 12.2.1.

General provisions

This chapter addresses the occurrence of clinical or asymptomatic *infection* of a mare caused by *Taylorella equigenitalis* as well as the presence of *T. equigenitalis* on the genital skin and mucous membrane surface in the male horse.

Rational

In histologically, surface of urethal sinus, fossa glandis and prepuce are skin. Thus ‘genital skin and mucous membrane surface ‘ will be more accurate.