Japan's Comments on
The Code Commission Report of the February 2016 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 and thank the TAHSC for providing us the opportunity to comment on the proposed revisions to the text of Terrestrial Animal Health Code.

Please find our comments on the following texts:

1. Chapter 6.X. Prevention and Control of *Salmonella* in Commercial Cattle Production Systems
2. Chapter 6.Y. Prevention and Control of *Salmonella* in Commercial Pig Production Systems
3. Chapter 6.1. The Role of the Veterinary Services in Food Safety Systems
4. Chapter 8.X. Infection with *Mycobacterium tuberculosis* complex
5. Chapter 15.1 Infection with African swine fever virus

1. Chapter 6.X. Prevention and Control of *Salmonella* in Commercial Cattle Production Systems

Article 6.X.4.

Objectives of prevention and control measures

It is recommended that prevention and control measures be focused on those types of *Salmonella* of greatest consequence to cattle or public health.

Prevention and control measures in commercial cattle production systems may:

1) reduce the prevalence and concentration of *Salmonella* entering the slaughterhouse/abattoir and therefore decrease the challenge to the slaughter and dressing procedures and the likelihood of bovine meat contamination;

2) reduce the likelihood of *Salmonella* contamination in milk;

3) reduce *Salmonella* contamination of the environment via cattle faecal waste, which in turn will limit infection of animals (including wildlife);

4) reduce the likelihood of infections in humans through contact with infected cattle or contaminated material.

It is recommended that good practices (such as Good Agricultural Practice) and the principles of hazard analysis and critical control points (HACCP)are taken into account for prevention and control measures , where appropriate.

Rationale

For food safety, there should be an emphasis on good practices (such as Good Agricultural Practice) and the principles of hazard analysis and critical control points (HACCP).

Article 6.X.5.

Biosecurity

Biosecurity is intended to assist with the prevention and control of *Salmonella*. A biosecurity management plan should be developed according to the commercial cattle production systems employed e.g. intensive or extensive, and for beef or for dairy. The applicability of the measures, described below, will vary according to the type of commercial cattle production system.

When including *Salmonella* as part of a biosecurity management plan it is recommended that the following be addressed:

1) location, design and management of the establishment;
2) veterinary supervision of cattle health;
3) management of the introduction and mixing of cattle;
4) training of personnel in their responsibilities and their role in animal health, human health and food safety;
5) maintenance of records including data on cattle health, production, movements, medications, vaccination, and mortality, and cleaning and disinfection of farm buildings and equipment;
6) availability of test results to the farm operator when *Salmonella* surveillance is conducted;
7) removal of unwanted vegetation and debris that could attract or harbour pests around cattle premises;
8) minimising the entry of wild birds into cattle buildings and feed stores;
9) cleaning and disinfection procedures for buildings in which cattle are handled or housed. For example, the cleaning and disinfection procedures for intensive calf housing, calving areas and sick pens after emptying may include feeders, drinkers, floor, walls, aisles, partitions between pens, and ventilation ducting. All visible organic material should be removed before disinfection.
   When chemical disinfectants are used, the effective concentration and contact time for *Salmonella* should be considered and the choice of disinfectant should take into account the cleaning process. Surfaces should be allowed to dry after disinfection. Disinfectants should be used in accordance with Chapter 4.13.;

10) control of pests such as rodents and arthropods and regular assessment of effectiveness;
11) control and hygienic procedures for entry and movement of persons and vehicles;
12) biosecurity applied to all personnel and visitors entering the establishment. As a minimum, this should include hand washing and disinfection of footwear. Similar precautions are recommended when they move between separate *epidemiological units* on large farms;
13~~2~~) cleaning and disinfection of equipment and vehicles identified as posing a risk;
14~~3~~) storage and disposal of dead animals, bedding, faeces and other potentially contaminated farm waste in a manner that minimises the likelihood of dissemination of *Salmonella* and prevents the direct or indirect exposure of humans, livestock and wildlife to *Salmonella*. Particular care should be taken when cattle bedding and faeces are applied to land used for horticultural crops intended for human consumption~~.~~;
15) control and hygienic procedures for prevention of infections in personnel and visitors through contact with infected cattle or contaminated material;
16) where appropriate, biosecurity procedures for prevention of further dissemination of *Salmonella* in cattle when an animal is suspected or known to be infected.

Rationale

As to the first paragraph, Japan suggests that a biosecurity management plan take into account a difference between beef and dairy production systems as well as a difference between extensive and intensive cattle production systems.

As to new 12) of the second paragraph, Japan suggests including biosecurity applied to all personnel and visitors entering the establishment as proposed in Article 6.Y.5 because they could introduce *Salmonella* to the establishment.

As to new 15) of the second paragraph, Japan suggests including prevention of infections in personnel and visitors through infected animals or contaminated material because it is one of the objectives mentioned in Article 6.X.4.

As to new 16) of the second paragraph, Japan suggests including biosecurity procedures in case of suspected or confirmed *Salmonella* infection.

Article 6.X.7.

Management of cattle introductions

To minimise the likelihood of introducing *Salmonella* through cattle introductions, it is recommended that:

1) good communication within the cattle industry be encouraged to raise awareness of the likelihood of introducing *Salmonella* through cattle introductions;
2) consideration be given to minimising the number of sources of replacement cattle;
3) the introduction of new genetic material through the use of semen and embryos be considered whenever practicable;
4) if possible, cattle be sourced directly from herds of origin because live animal markets or other places where cattle from multiple properties are mixed for resale may increase the likelihood of spread of *Salmonella* and other infectious agents among cattle;
5) newly introduced cattle be kept separate from the rest of the herd for a suitable period before mixing with other cattle, e.g. four weeks;
6) where appropriate, testing of animals for *Salmonella* prior to ~~introduction~~ mixing with other cattle be considered to inform subsequent control measures, for example, when introducing cattle of unknown status.

Rationale

Japan suggests that testing of newly introduced animals for *Salmonella* during separation from the rest of the herd be included.

2. Chapter 6.Y. Prevention and Control of *Salmonella* in Commercial Pigs Production Systems

Article 6.Y.4.

Objectives of prevention and control measures

It is recommended that prevention and control measures be focused on those types of *Salmonella* of greatest consequence to pigs and public health.

Prevention and control measures in commercial pig production systems may:

1) reduce the prevalence and concentration of *Salmonella* entering the slaughterhouse/abattoir and therefore decrease the challenge to the slaughter and dressing procedures and the likelihood of pig meat contamination;
2) reduce *Salmonella* contamination of the environment via pig manure, which in turn will limit infection of animals (including wildlife);
3) reduce the likelihood of infections in humans through contact with infected pigs or contaminated material.

It is recommended that good practices (such as Good Agricultural Practice) and the principles of hazard analysis and critical control points (HACCP) are taken into account for prevention and control measures, where apropriate.

Rationale

For food safety, there should be an emphasis on good practices (such as Good Agricultural Practice) and the principles of hazard analysis and critical control points (HACCP).

Article 6.Y.5.

Biosecurity

Biosecurity is intended to assist with the prevention and control of *Salmonella*. The choice of specific measures will vary according to the type of commercial pig production system.

When including *Salmonella* as part of a biosecurity management plan, it is recommended that the following be addressed:

1) location, design and management of the establishment;
2) veterinary supervision of pig health;
3) management of the introduction and mixing of pigs;
4) training of personnel in their responsibilities and their role in animal health, human health, food safety;
5) maintenance of records including data on pig health, production, movements, medications, vaccination, mortality and cleaning and disinfection of farm buildings and equipment;
6) availability of test results to the farm operator when *Salmonella* surveillance is conducted;
7) removal of unwanted vegetation and debris that could attract or harbour pests around pig housing;
8) minimising the entry of wild birds into pig buildings and feed stores;
9) cleaning and disinfection procedures for buildings in which pigs are handled or housed, including feeding systems, drinkers, floor, walls, aisles, walkways, partitions between pens, and ventilation ducting. All visible organic material should be removed before disinfection.
10) control of pests such as rodents and arthropods, and regular assessment of effectiveness;
11) control and hygienic procedures for entry and movement of persons and vehicles;
12) biosecurity applied to all personnel and visitors entering the establishment. As a minimum, this should include hand washing and changing into clean clothes and footwear provided by the establishment. Similar precautions are recommended when they move between separate epidemiological units on large farms;
13) cleaning and disinfection of equipment and vehicles identified as posing a risk;
14) storage and disposal of dead animals, bedding, faeces and other potentially contaminated farm waste in a manner that minimises the likelihood of dissemination of *Salmonella* and prevents the direct or indirect exposure of humans, livestock and wildlife to *Salmonella*. Particular care should be taken when pig bedding and faeces are applied to land used for horticultural crops intended for human consumption;.

15) control and hygienic procedures for prevention of infections in personnel and visitors through contact with infected pigs or contaminated material;
16) where appropriate, biosecurity procedures for prevention of further dissemination of *Salmonella* in pigs when a pig is suspected or known to be infected.

Rationale

As to new 15) of the second paragraph, Japan suggests including prevention of infections in personnel and visitors through infected animals or contaminated material because it is one of the objectives mentioned in Article 6.Y.4.

As to new 16) of the second paragraph, Japan suggests including biosecurity procedures in case of suspected or confirmed *Salmonella* infection.

Article 6.Y.7.

Management of new pig introductions into the establishment

Introduction of pigs into a herd is an important risk factor in moderate and high prevalence regions. To minimise the likelihood of introducing *Salmonella* by replacement pigs, it is recommended that:

1) good communication along the pig production chain be encouraged to raise awareness of the risk of introducing *Salmonella* through pig introductions;
2) consideration be given to minimising the number of sources for both replacement breeding stock and rearing pigs, and matching *Salmonella* herd status in terms of *Salmonella* freedom or occurrence of priority serotypes such as S. Typhimurium;
3) the introduction of new genetic material be through the use of semen whenever possible;
4) if possible, pigs be sourced directly from herds of origin because live animal markets or other places where pigs from multiple properties are mixed for resale may increase the likelihood of spread of *Salmonella* and other infectious agents among pigs;
5) newly introduced pigs be kept separate from the rest of the herd for a suitable period before mixing with other pigs, e.g. four weeks;
6) where appropriate, testing of pigs for *Salmonella* prior to ~~introduction~~ mixing with other pigs be considered to inform subsequent control measures, for example, when introducing pigs of unknown status.

Rationale

Japan suggests that testing of newly introduced animals for *Salmonella* during separation from the rest of the herd be included.

3. Chapter 6.1 The Role of the Veterinary Services in Food Safety Systems

Article 6.1.4.

The role of the Veterinary Services in a food safety system

1. Responsibilities of the Veterinary Services

The Veterinary Authority or other Competent Authority should provide an appropriate institutional environment to allow the Veterinary Services to implement the necessary policies and standards, and adequate resources for them to carry out their tasks in a sustainable manner. Within the Veterinary Services there should be a clear and well documented assignment of responsibilities and chain of command. In developing policies and national standards for food safety, the Veterinary Authority or other Competent Authority should collaborate with other responsible agencies to ensure that food safety risks are addressed in a coordinated manner.

In order for Veterinary Services to make the best possible contribution to food safety, it is important that the education and training of veterinarians and veterinary para-professionals meet appropriate levels of competence and that there are national programmes for ongoing professional development. There should be education and training on good practices (such as Good Agricultural Practice, Good Hygienic Practice) and on the principles of hazard analysis and critical control points (HACCP) [1].

1 General Principles for Food Hygiene (Codex Alimentarius Commission, CAC/RCP 1-1969)

Rationale

Japan is of the opinion that it is desirable for veterinarians and veterinary para-professionals to understand GAP and the principles of HACCP.

Article 6.1.4.

2. Activities throughout the food chain

a) Primary production

Through their presence on farms and appropriate collaboration with farmers, Veterinary Services play a key role in ensuring that animals are kept under hygienic conditions and in the early detection, surveillance and treatment of animal diseases, including conditions of public health significance. The Veterinary Services advise on animal husbandry practices, biosecurity and interventions that limit the transmission of animal diseases, including foodborne zoonoses.

Because of the importance of traceability throughout the food chain, the verification by the Veterinary Services of animal identification is an important function.

The Veterinary Services assist farmers on how to minimise chemical hazards (e.g. drug and pesticide residues, mycotoxins and environmental contaminants) in primary production, including through animal feed. Producers' organisations, particularly those with veterinary advisers, are in a good position to provide awareness and training as they are regularly in contact with farmers and are well placed to understand their priorities. Technical support from the Veterinary Services is important and both private veterinarians and employees of the Veterinary Authority can assist. The Veterinary Services play a central role in ensuring the responsible and prudent use of biological products and veterinary drugs, including antimicrobial agents, in animal husbandry. This helps to minimise the risk of developing antimicrobial resistance and unsafe levels of veterinary drug residues in foods of animal origin.

The Veterinary Services also assist farmers in control of physical hazards (e.g. needles) in primary production.

Rationale

Japan suggests that physical hazards be included because they also need to be dealt with.

4. Chapter 8.X Infection with *Mycobacterium tuberculosis* complex

Article 8.X.6.

Herd free from infection with *M. tuberculosis* complex in bovids or cervids

2) to maintain the free status, either:

c) ~~When there is a known *wildlife* reservoir of *M. tuberculosis* complex, all *herds* in the country or *zone* are covered by a *surveillance* programme in accordance with point 1c) of Articles 8.X.4. and 8.X.5 and all *herds* identified as being at risk of *infection* with *M. tuberculosis* complex, based on;~~

The following requirements are met:

i) all herds in the country or zone are covered by a surveillance programme in accordance with point 1c) of Articles 8.X.4. and 8.X.5.

ii) the risk of transmission of *infection* with *M. tuberculosis* complex from wildlife reservoir has been assessed through active surveillance, and all herds identified as being at risk are subjected to a testing programme commensurate with the assessed epidemiological risk of infection with *M. tuberculosis* complex. In identifying herds at risk, the following should be considered.

~~i)~~ - a location associated with suspected or confirmed *infection* with *M. tuberculosis* complex in *wildlife*; or

~~ii)~~ - a history of *infection* with *M. tuberculosis* complex within last five years; or

~~iii)~~ - an epidemiological link with *herds* in c) i) or ii);

~~are subjected to a testing programme commensurate with the assessed epidemiological risk of *infection* with *M. tuberculosis* complex.~~

Rationale

The situation in which the absence of wildlife reservoir is confirmed should be included in the requirements for the provisions.

5. Chapter 15.1 Infection with African swine fever virus

Article 15.1.2.

General criteria for the determination of the ASF status of a country, zone or compartment

(Last paragraph)

Commodities of domestic or *captive wild* pigs can be traded safely according to the relevant articles of this chapter from countries complying with the provisions of this article, even if they notify *infection* with ASFV in *wild* or *feral* pigs or African *wild* suids.

Rationale

Japan would like to confirm that the phrase “countries complying with the provisions of this article” implies the process of temporary import suspension in order for the importing country to take the opportunity for risk analysis, if necessary, to ensure whether the exporting country complies with the provisions.