**Japan’s Comments on The Terrestrial Animal Health Standards Commission Reports of the February 2021 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 11.4. BOVINE SPONGEFORM ENCEPHALOPATHY

## 1) Comment on Chapter 11.4.

**Article 11.4.3.**

**Negligible BSE risk**

1) A *risk assessment* as described in Article 11.4.2. that has identified all potential risk factors associated with the occurrence of BSE has been conducted, and the Member Country has demonstrated through documented evidence that the risk of BSE agents being recycled in the cattle population has been negligible.

**Article 11.4.18.**

**Surveillance**

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

**Comments**

With regard to the substantial changes on BSE surveillance especially in the context of official risk status recognition, Japan has concern how current negligible status is evaluated and maintained under the new chapter requirements. Since it is still unclear what level of surveillance will be considered to be "appropriate" in maintaining current negligible risk status, many of the OIE Members may face difficulties in revising current surveillance design.

In addition, General Criteria for the determination of the BSE risk is indicated in the revised chapter. Although Japan agree with the revision which provides good guidance in conducting in-country BSE risk assessment, there is a concern how it affects current negligible status which was granted based on the risk assessment conducted under the current Chapter.

Thus, Japan request the OIE to provide clear explanation regarding transition process and criteria on risk status before finalizing the revision.