Japan's comments on the proposed guidance and amendments of the Aquatic Animal Health Codes in the Aquatic Animal Health Standards Commission Report of the September 2009 meeting

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1. Glossary

Specific Comments

(Proposed text)

GLOSSARY

Feed additives

means any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value or other effect on the *animal*, which affects the characteristics of feed of the *animal* products. Microorganisms, enzymes, pH regulators, trace elements, vitamins and other products fall within the scope of this definition depending on the purpose of use and method of administration. This excludes veterinary drugs.

(Rationale)

"Feed additives" is not used in any chapter including the chapter for "Control of Hazards of Aquatic Animal Health and Public Health Importance in Aquatic Animal Feeds".

2. Chapter 7.3. Slaughter of Farmed Fish for Human Consumption (Annex XXII)

Specific Comments

(Proposed text)

Article 7.3.1 Scope

As a general principle, fish should be immediate and irreversible loss of consciousness should be ensured by appropriate methods such as stunning stunned before and/or when killing and the stunning method should ensure immediate and irreversible loss of consciousness. If the method stunning is not irreversible, fish should be killed before consciousness is recovered.

(Rationale)

Important factor for humane slaughter of fish is to ensure immediate and irreversible loss of consciousness before or when killing rather than to ensure the stunning. Stunning is only an example to satisfy the mentioned factor.

In Japan, farmed fish are often killed at once by cut at medulla and gills with very sharp edged tool. It seems less painful to cut at once than stun (e.g. electric shock) and kill. Japan believes killing methods vary in countries and in some country there is a case that immediate killing seems less painful than stunned previously.

(Proposed text)

Article 7.3.7.

Application Examples of some stunning methods for fish groups

The following stunning methods enable humane killing for the following fish groups:

- a) Percussive stunning: carp, catfish, salmonids, halibut;
- b) Spiking or coring: salmonids, tuna;
- c) Free bullet: tuna;
- d) Electrical stunning: carp, catfish, eel, salmonids, tilapia.

(Rationale)

Stunning methods described in Article 7.3.7. do not cover all stunning methods for wide range of species. Japan believes that this Article provides examples for stunning and requests an amendment to clarify this point.

3. Chapter 11.X Infection with Abalone Herpes-like Virus (Annex XIX)

Specific Comments

(Proposed text)

Article 112.2.X.1.

For the purposes of the *Aquatic Code*, infection with abalone herpes-like virus means any form of the abalone viral mortality complex (AVM) caused by infection only with abalone herpes-like virus.

(Specific comments)

Since definition of "abalone viral mortality complex (AVM)" is unclear, Japan proposes to delete the description related to AVM.

Considering that the meaning of "infection with abalone herpes-like virus" can be easily understood from its disease name, Japan believes that Article 11.1. is not necessary. If needed for consistency, Japan proposes to make the description in line with other disease chapters (e.g. chapters 11.1 - 11.6.).

4. Article X.X.8. for All Disease Specific Chapters (Annex XVIII)

General Comments

Japan would like to seek clarification on the 2.17. on page 7 of the report "Invasive alien species".

"Invasive alien species" is defined as "an alien species whose introduction and/or spread threaten biological diversity" under the Convention on Biological Diversity. Since conservation of biological diversity is outside the mandate of OIE, Japan would like the Aquatic Animal Commission to clarify what specific goal OIE is trying to achieve within the OIE's mandate regarding this topic.

Specific Comments

(Proposed text)

AN EXAMPLE (DISEASE X)

TO BE APPLIED ACROSS ALL TO SPECIFIC DISEASE CHAPTERS (SECTIONS 8, 9, AND 10 AND 11)

Article X.X.8.

Importation of live aquatic animals for aquaculture from a country, zone or compartment not declared free from 'Disease X'

2. If the intention of the introduction is the establishment of a new stock of marine organisms, the Code of Practice on the Introductions and Transfers of Marine Organisms of the International Council for the Exploration of the Seas (ICES) should be considered followed.

(Rationale)

As scope of the International Council for the Exploration of the Sea is limited to marine organisms in the North Atlantic, Japan requests the Aquatic Animal Commission not to include proposed texts in the disease chapters for fresh water animals such as amphibians. In addition, Japan proposes to add words to clarify that scope is limited to the introduction of a new stock of marine organisms.

5. Guidance on Considering Species as Susceptible to a Disease (Annex XXIV)

Specific Comments

(Proposed Text)

GUIDANCE ON CONSIDERING SPECIES AS SUSCEPTIBLE TO A DISEASE

3. Criteria for infection

The presence of a multiplying or otherwise developing or latent *disease agent* in or on the live aquatic animal should be assessed for infection of a host species.

<u>In addition</u>, a combination of these criteria <u>can-should</u> be used to assess infection of a host species:

i) presence of an infectious or a viable organism, in or on, the live aquatic animal;

ii) evidence of multiplication or other development of the organism;

iii) clinicopathological changes associated with the infection; and/or

iiv) specific location of the pathogen.

(Rationale)

As definition of "infection" requires presence of disease agents and multiplication or other development of the disease agent as essential factors, Japan proposes to distinguish these two factors from other two options and place as required conditions.