Japan's comments on
the Code Commission Report of the September 2012 meeting

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NOTE

Please find the following specific comments in which proposed insertion is underlined and proposed deletion is ~~struck-out~~. Any insertions or deletions by Japan are written in grey on this paper.

1. General Comments

Japan would like to express its appreciation to the *Terrestrial Animal Health Standards Commission* (TAHSC) and related Working Groups and *ad hoc* Groups for all the work they've done and thanks the TAHSC for giving us the opportunity of providing comments on proposed revisions to *Terrestrial Animal Health Code* texts.

We think that, in order to improve the quality of the OIE *Code*, it is important that Members positively participate in developing the *Code*. For encouraging Member's involvement, transparency of the discussion and communication with Members are important. Although the reports of the TAHSC improved in this regard, the recent report of the TAHSC refers only their conclusions and lacks of rationale for their acceptance or rejection of Member's comments

Japan would, therefore, like to reiterate to the TAHSC that they should describe rationale and scientific background for their decision in the reports.

2. Clarification of the role of the OIE *Terrestrial Animal Health Code*

Specific Comments

Japan does not have major concerns about the current user's guide text. However, if the revised text is to be adopted, possible problems should be clarified through the regular procedure and the text never provided for written comments should not be proposed for adoption at the immediate General Session.

3. Report of the meeting of the OIE *ad hoc* Group on Notification of Animal Diseases and Pathogenic Agents (Annex VII)

General Comments

Japan would like to show respect to the *ad hoc* Group for all the work they've done. We do not, however, support its proposal. Since OIE listing diseases are basis of the OIE *code* and *manual*, and since there could be a concern that, once a disease is delisted, we might let its international importance go unremarked, we should discuss them more carefully.

Since the *ad hoc* Group lacks specialist knowledge about each animal species (i.e. bovine, swine and avian) and each scientific area (i.e. virology, bacteriology and parasitology) and geographical balance, Japan would like to suggest to the OIE that it convene an *ad hoc* group which is composed of new members appointed taking those factors into consideration. The current *ad hoc* group is composed mainly of the experts on diseases notification system and epidemiology and 5 out of the 7 members are selected from Europe.

We would like to suggest that, before they discuss the suitability of each disease as an OIE listing disease, the TAHSC and the *ad hoc* group clarify the interpretations of the following terms of the criteria for listing diseases:

- international spread;
- freedom:
- severe consequences;

- significant;
- morbidity;
- mortality; and
- reliable means of detection and diagnosis.

We could never arrive at common conclusions unless we share common comprehension about the terms. We would like to expressly point out that it is necessary to clearly define the term of “reliable means of detection and diagnosis” in the evaluation of each disease on the basis of sensitivity and specificity and that, without the clarification, it is inappropriate to recommend delisting of diseases for the reason that there are no “accurate diagnostic tests” applicable for animals in incubation period.

In addition, when we define the terms, we should sufficiently discuss and clarify the followings:

- how to evaluate “international spread” of diseases transmitted by vectors in the context of progress of global warming;
- how to evaluate “freedom” of diseases which are not included in the current list, in case of listing new diseases; and
- how to consider “morbidity” of persistent and chronic diseases.

We are deeply concerned about the conclusion that Swine Vesicular Disease and Vesicular Stomatitis should be delisted. It is important for diagnosis of Foot and Mouth Disease (FMD) to differentiate these diseases from FMD. If using the current criteria led to the conclusion, it would pose a serious problem on international FMD control in which international societies expect the OIE to demonstrate its initiative and therefore the criteria should be reviewed and revised in order not to exclude these diseases from the list.

Delisting of a certain disease could discourage efforts of each Member for adopting control measures aiming for eradication of the disease. As for the criterion of “at least one country has demonstrated impending freedom from the disease”, countries which are unlikely to eradicate the disease in a short-term but adopt long-term eradication programme for the disease should, therefore, be interpreted as those demonstrating impending freedom from the disease and the disease be regarded to meet the criterion.

Specific Comments

As mentioned above, Japan takes the standpoint that it opposes the recommendation of the *ad hoc* Group that the 16 diseases should be delisted. In addition, we have specific concerns about the rationale of the *ad hoc* Group for delisting of each disease as below:

Bovine Genital Campylobacteriosis:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended the disease should be delisted for the reason that they cannot regard the country claiming freedom as such due to lack of a control programme to justify the declaration. Disease freedom of countries should be, however, discussed in the Scientific Commission and the *ad hoc* Group is not given a mandate by the OIE to discuss it.

Enzootic Bovine Leukosis:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that it does not show significant morbidity. It is, however, obvious from OIE data that infection of the disease is spread. The concept of "significant morbidity" should be adjusted not to delist the disease because it is important for livestock sectors due to its high infection rate and fatal outcomes of clinical cases.

Haemorrhagic Septicemia:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that the disease is not spread internationally through movement of live animals or their products. As the TAHSC points out, however, the disease is an important serious transboundary animal disease which is spread through transportation of live animals.

Infectious Bursal Disease (Gumboro Disease):

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that it has low morbidity/mortality due to effective control measures Availability of effective control measures (i.e. vaccine) is not, however, included in the criteria for listing diseases.

Nipah Virus Encephalitis:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that international spread of the disease via live animals, their products or fomites has not been proven. It has, however, been reported that the disease was spread with transportation of infected pigs between Malaysia and Singapore, and between India and Bangladesh (Field *et al*., 2001, and Snary *et al*., 2012, respectively).

Paratuberculosis:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that the disease does not have an accurate diagnostic test. There are, however, diagnostic methods for the disease such as real-time PCR as well as bacterial culture of faeces and antibody detection such as CF and ELISA, which are described in the OIE *Manual*. ELISA kit for the disease is commercially available. On the other hand, the disease would spread widely if no measures against it are carried out, and it would pose serious impact on livestock production.

Scrapie:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that the disease does not show significant morbidity or mortality. Taking into consideration that international societies expect the OIE to demonstrate its initiative in prevention and control of the prion diseases, however, the concept of the "morbidity" of diseases with long incubation period should be adjusted not to delist the disease.

Swine Vesicular Disease:

Japan opposes the delisting of this disease. As mentioned in the general comments, listing of the disease is important to prevent and control FMD because it shows similar clinical signs to FMD and cannot be differentiated from FMD without laboratory tests. Misdiagnosis of FMD as SVD might cause national and international epidemics of FMD. Outbreaks of SVD might hinder *Veterinary Services* from controlling FMD.

Transmissible Gastroenteritis:

Japan opposes the delisting of this disease. The *ad hoc* Group recommended that the disease should be delisted for the reason that a reliable diagnostic test is not available and the disease is easily controllable with effective vaccine. The disease can, however, be diagnosed by gene detection combined with epidemiological information, and rapid detection kits and Antibody Identification ELISAs are also commercially available. The *ad hoc* Group refers to the existence of an effective vaccine, but the existence of vaccine is not included in the criteria for listing diseases.

Vesicular Stomatitis:

Japan opposes the delisting of this disease. As mentioned in the general comments, listing of the disease is important to prevent and control FMD because it shows similar clinical signs to FMD and cannot be differentiated from FMD without laboratory tests.

4. Chapter 7.X – Draft new chapter on Animal Welfare and Broiler Chicken Production System (Annex XV)

Specific Comments

Article 7.X.5.

Recommendations

1. Biosecurity and animal health

a) Biosecurity and disease prevention

Recommendations in Chapter 6.4 should be followed.

~~Biosecurity means a set of measures designed to maintain a *flock* at a particular health status and to prevent the entry (or exit) of specific infectious agents.~~

~~Biosecurity programmes should be implemented, commensurate with the risk of disease and in accordance with relevant recommendations found in Terrestrial Code chapters on OIE listed diseases.~~

~~Biosecurity programmes should be designed and implemented, commensurate with the desired flock health status and current disease risk (endemic and exotic or transboundary) that is specific to each epidemiological group of broilers and in accordance with relevant recommendations found in *Terrestrial Code* chapters on OIE listed diseases.~~

~~These programmes should address the control of the major routes for disease and pathogen transmission:~~

~~a) direct transmission from other poultry, domesticated and wild animals and humans,~~

~~b) fomites, such as equipment, facilities and *vehicles*,~~

~~c) vectors (e.g., arthropods and rodents),~~

~~d) aerosols,~~

~~e) water supply,~~

~~f) feed.~~

Outcome based measurables: incidence of diseases, metabolic disorders and parasitic infestations~~;~~ mortality~~,~~ ~~and~~ performance.

b) Animal health management~~,~~ ~~/~~ preventive medicine and~~/~~ veterinary treatment

….

If persons in charge are not able to identify the causes of *disease*, ~~of~~ ill-health or distress~~,~~ or to correct these~~,~~ or if they suspect the presence of a ~~listed~~ reportable disease, they should seek advice from ~~those having training and experience, such as~~ ~~poultry~~ *veterinarians* or other qualified advisers. Veterinary treatments should be prescribed by a ~~qualified~~ *veterinarian*.

….

Vaccinations and ~~other~~ ~~administered~~ treatments should be administered ~~undertaken~~ ~~with consideration of the welfare of the~~ ~~broilers~~ by ~~qualified~~ personnel skilled in the procedures~~,~~ on the basis of veterinary or other expert advice and with consideration for the welfare of the broilers.

(Rationale)

In point a), there is duplication in the 2nd and 3rd paragraphs, moreover, the whole contents of point a) is duplication of Chapter 6.4. Therefore it should be replaced by a simple reference.
In point b), Japan proposes to further harmonize the texts with those in beef cattle production

system.

Article 7.X.5.

Recommendations

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2. Environment and management

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m) Handling and inspection

Broilers should be inspected at least once~~twice~~ a day and the frequency should be increased according to the broilers' condition. Inspection should have three main objectives: ~~1)~~ to identify sick or injured broilers to treat or cull them~~;~~ ~~2)~~ to detect and correct any welfare or health problem in the *flock* ~~(e.g. related to the supply of feed and water, thermal conditions, ventilation, litter quality)~~;~~,~~ and ~~3)~~ to pick up dead broilers.

(Rationale)

Handling of broilers needs to be flexible and based on their condition such as by increasing the inspection frequency after environmental change or when it is extremely hot or cold. Entry of the farmers into a poultry house should be minimal in view of biosecurity.

5. Chapter 7.9 – Animal Welfare and Beef Cattle Production System (Annex XVIII)

Specific Comments

Article 7.9.5.

Recommendations

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3. Management

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~~Cattle that are tethered should, as a minimum, be able to lie down, turn around and walk.~~

(Rationale)

The proposed text is not always applicable indoors because "be able to …turn around and walk" is too restrictive.

A tie stall system has advantages for individual cattle managements and even contributes to the welfare of the cattle as long as they are managed appropriately as recommended in other part of the chapter. Farmers can observe individual cattle closely and easily so that they can manage the cattle according to their performance and conditions. Under controlled environment, cattle are free from social interaction problems and have secure access to feed. A tie stall system should not be restricted simply because cattle are tethered.

Beef and dairy cattle scientifically belong to the same species (*bos taurus*). A Japanese beef production system involves intensive cares similar to dairy cattle which are kept in a tie stall system. Indoor tethering is common in a rural production system with limited land resources in Asia.

Global animal welfare standards must be flexible using outcome based criteria as repeated in the previous OIE Animal Welfare Working Group meetings and at the OIE General Sessions. Japan also notes that the chapter on production system was adopted on balance of different opinions of the all OIE Member Countries last year. The Code provisions should be applicable to all production system worldwide.

An exclusive proposal to outdoor environment would be acceptable. However, even if a provision for indoor environment is indispensable, it should be similar to that of dairy cattle.

(Proposed alternative text)

Cattle that are tethered outdoors should, as a minimum, be able to lie down, turn around and walk.

Cattle that are tethered indoors should be kept in a similar manner to dairy cattle in Chapter X.X. (under study).

6. Chapter 7.9 – Infection with *Trichinella* spp. (Annex XXI)

Specific Comments

~~Article 8.13.4.~~

~~**Prerequisite criteria for the establishment of a compartment with a negligible risk of *Trichinella* infection in domestic pigs kept under controlled management conditions**~~

~~A *compartment* with a negligible risk of *Trichinella infection* in domestic pigs kept under controlled management conditions can only be established if the following criteria are met in the country, as applicable:~~

~~1) *Trichinella infection* in all species of susceptible *animals* is notifiable in the whole *territory* and communication procedures on the occurrence of *Trichinella infection* is established between the *Veterinary Authority* and the Public Health Authority;~~

~~2) the *Veterinary Authority* has current knowledge of, and authority over, all domestic pigs;~~

~~3) the *Veterinary Authority* has current knowledge of the distribution of susceptible species of *wildlife*;~~

~~4) an *animal identification* and *traceability* system for domestic pigs is implemented in accordance with the provisions of Chapters 4.1. and 4.2.;~~

~~5) appropriate provisions are in place for tracing of *meat* from *wild animals* harvested for human consumption;~~

~~6) *surveillance* appropriate to the assessed epidemiological situation and capable of detecting the presence of *Trichinella infection* (including genotype, if relevant) in domestic pigs and exposure pathways, is in place.~~

Article 8.13.5.

Compartment with a negligible risk of *Trichinella* infection in domestic pigs kept under controlled management conditions

A *compartment* may be officially recognised as having negligible risk of *Trichinella infection* in domestic pigs kept under controlled management conditions if the following conditions are met:

1) all *herds* of the *compartment* comply with requirements in Article 8.13.3.;

2) ~~the criteria described in Article 8.13.4. have been complied with~~ for at least 24 months, the *Veterinary Authority* has had knowledge of, and authority over, all domestic pigs of the *compartment*; and an *animal identification* and *traceability* system for them has implemented in accordance with the provisions of Chapter 4.1 and 4.2;

3) the absence of *Trichinella infection* in the *compartment* has been demonstrated by a *surveillance* programme appropriate to the assessed epidemiological situation and capable of detecting the presence of *Trichinella infection* (including genotype, if relevant) in domestic pigs and exposure pathways. The choice of design, including duration, prevalence and confidence levels should be based on the prevailing, or historical, epidemiological situation, as appropriate, in accordance with Chapter 1.4. and using tests described in the *Terrestrial Manual*;

4) once a *compartment* is established, a subsequent programme of audits of all *herds* within the *compartment* is in place to ensure compliance with Article 8.13.3.;

5) if the audit identified a lack of compliance with one or more of the criteria described in Article 8.13.3. and the *Veterinary Authority* determined this to be a significant breach of biosecurity, the *herd(s)* concerned should be removed from the *compartment* until compliance is re-established.

(Rationale)

According to the proposed revised Chapter, Members wishing to establish the compartment are required to meet the conditions for compartment as well as the prerequisite criteria for country. However, the criteria for compartment should be originally stipulated as conditions for compartment itself but not for country. It is inappropriate to stipulate the conditions on national systems for a whole territory as prerequisite criteria for compartment.

The clause 1 of Article 8.13.5 is a requirement for a country and it is irrational to adopt it as a prerequisite for establishment of each compartment.

As for the clause 3 of Article 8.13.5, it is irrational to require the Veterinary Authority to have current knowledge of the distribution of wildlife living out of the compartment because a compartment should be established only on the condition that it is prevented from invasion of the pathogenic agents from its outside by appropriate biosecurity measures.

As for the clause 5 of Article 8.13.5, it is irrational to require the distribution managements of wildlife meat that has nothing to do with the compartment. A compartment should be established only on the basis of prevention from invasion of the pathogenic agents from its outside and of its grasp of the current health situation of it.

Article 8.13.6.

Recommendations for the importation of meat or meat products of domestic pigs

Veterinary Authorities of *importing countries* should require the presentation of an *international veterinary certificate* attesting that the entire consignment of *meat* or *meat products*:

1) has been produced in accordance with the Codex Code of Hygienic Practice for Meat (CAC/RCP 58-2005);

AND

2) either:

   a) comes from domestic pigs originating from a *compartment* with a negligible risk for *Trichinella infection* in accordance with Article 8.13.5.;

   OR

   b) comes from domestic pigs that come from historically free herds or free herds which are demonstrated free by surveillance [under study] ~~tested negative by the digestion method for the detection of *Trichinella* larvae, as described in the *Terrestrial Manual*~~;

   OR

   c) was processed to ensure the inactivation of *Trichinella* larvae in accordance with Codex recommendations [under study].

Article 8.13.8.

Recommendations for the importation of meat or meat products of domestic equids

Veterinary Authorities of *importing countries* should require the presentation of an *international veterinary certificate* attesting that the entire consignment of *meat* or *meat products*:

1) has been produced in accordance with the Codex Code of Hygienic Practice for Meat (CAC/RCP 58-2005);

AND

2) comes from domestic equids that come from historically free herds or free herds which are demonstrated free by surveillance [under study] ~~tested negative by the digestion method for the detection of *Trichinella* larvae, as described in the *Terrestrial Manual*~~

(Rationale)

The recommendation that an exporting country should be required to test all domestic animals to be exported would bring significant barrier to the international trade of the meat and meat products. In addition, the effectiveness of the risk mitigation of the inspection, which requires a lot of costs and labors, is doubtful or the cost-effectiveness must be low because the livestock is normally managed by herds and is infected with the parasite through digestion of shared feed contaminated with the muscle larvae.

Japan would, therefore, like to suggest to the TAHSC the above modification as well as the development of surveillance strategies to confirm negative of pig/equid herds. Taking the significant impact of these articles on the international trade of the meat and meat products into account, the articles should be put under study until the adoption of new articles on the surveillance strategies through the prescribed 2-year procedure. We might incidentally remark that infection of livestock with *Trichinella* spp. has never been detected in Japan.

7. Bee Diseases (Annex XXIV)

General Comments

Japan would like to show its respect to the TAHSC and the *ad hoc* Group for their efforts for preparing the draft revisions of all chapters related for bee diseases after re-evaluating them based on current knowledge, and we generally support the proposed revised texts excepting the following specific comments.

Specific Comments

Chapter 9.1 – Infestation of Honey Bees with *Acarapis woodi*.

Article 9.1.4.

Country or zone~~/compartment (under study)~~ free from acarapisosis

….

2. Free status as a result of an eradication programme

….

~~e)~~ ~~(under study) either there is no wild or self-sustaining feral population of *Apis* species of the genus *Apis A. mellifera* or other possible host species in the country or *zone/compartment* (under study), or there is an ongoing *surveillance* programme of the wild or self-sustaining feral population of species of the genus *Apis* which demonstrates no evidence of the presence of the *disease* in the country or *zone*;~~

Chapter 9.2－Infection of Honey Bees with *Paenibacillus larvae* (American Foulbrood)

Article 9.2.4.

Country or zone~~/compartment (under study)~~ free from American foulbrood

….

2. Free status as a result of an eradication programme

….

~~e)~~ ~~(under study) either there is no wild or self-sustaining feral population of species of the genus *Apis A. mellifera* or other possible host species in the country or *zone/compartment* (under study) , or there is an ongoing surveillance programme of the wild or self-sustaining feral population of species of the genus *Apis* which demonstrates no evidence of the presence of the *disease* in the country or *zone*;~~

Chapter 9.3 – Infection of Honey Bees with Melissococcus plutonius (European Foulbrood)

Article 9.3.4.

Country or zone~~/compartment (under study)~~ free from European foulbrood

….

2. Free status as a result of an eradication programme

….

~~e)~~ ~~(under study) either there is no wild or self-sustaining feral population of *A. mellifera* or other possible host species~~ species of the genus *Apis* ~~in the country or *zone*/*compartment* (under study),~~ or there is an ongoing *surveillance* programme of the wild or self-sustaining feral population of species of the genus *Apis* ~~which demonstrates no evidence of the presence of the *disease* in the country or *zone*~~;

Chapter 9.5 – Infestation of Honey Bees with *Tropilaelaps* spp.

Article 9.5.4.

Country or zone~~/compartment (under study)~~ free from *Tropilaelaps* spp.

….

2. Free status as a result of an eradication programme

….

~~e)~~ ~~(under study) either there is no wild or self-sustaining feral population of *Apis* species of the genus *Apis* *A. mellifera*, *A. dorsata* or *A. laboriosa*, or other possible host species in the country or *zone*/*compartment* (under study), or there is an ongoing *surveillance* programme of the wild or self-sustaining feral population of species of the genus *Apis* which demonstrates no evidence of the presence of the mite in the country or *zone*~~;

Chapter 9.6 – Infestation of Honey Bees with *Varroa* spp.

Article 9.6.4.

Country or zone~~/compartment (under study)~~ free from *Varroa* spp.~~varroosis~~

….

2. Free status as a result of an eradication programme

….

~~e)~~ ~~(under study) either there is no wild or self-sustaining feral population of *Apis* species *A. mellifera*, the Korea and Japan haplotypes of *Apis cerana* or other possible host species of the genus *Apis* in the country or *zone*/*compartment* (under study), or there is an ongoing surveillance programme of the wild or self-sustaining feral population of species of the genus *Apis* which demonstrates no evidence of the presence of the mite in the country or *zone*~~;

(Rationale)

The conditions are inappropriate at this stage because the criteria for effective surveillance or surveillance strategies on wild or feral population of honey bees have not been stipulated in the *Code* yet, and the surveillances to be carried out by countries, therefore, would not have reliability, though it would impose huge physical, human and financial resources on the countries.