Japan's comments on the Code adopted during the 78th General Session

List of comments

1. Chapter 4.12 – Disposal of Dead Animals
2. Chapter 7.5 – Slaughter of Animals
3. Chapter 11.5 – BSE

NOTE

Please find the following specific comments in which proposed insertion is underlined and proposed deletion is ~~struck out~~. Our comments are based on the Code of 2010 version (the code adopted at the 78th General Session).

1. Chapter 4.12 – Disposal of Dead Animals

(Proposed text)

Article 4.12.6 Recommended methods for the disposal of dead animals
10 Bio-refining

Bio-refining is a process of high pressure, high temperature thermal hydrolysis conducted in a sealed pressurised chamber. The waste material is treated with high-pressure saturated steam at 180°C under a minimum of 10 bar pressure and continuous disruption by mechanical stirring for a period of 40 minutes. The whole procedure, from the loading of the chamber until the discharge from the chamber, occupies approximately 120 minutes. All microbiological agents are inactivated and the infectivity of the infectious agents causing transmissible spongiform encephalopathies is destroyed. (under study)

(Rationale)

Japan would like to point out that the scientific evidence of the effectiveness of this newly introduced bio-refining method relies only on laboratory-scale experiments and thus the effectiveness of this method at much larger commercial-scale is yet to be demonstrated.

2. Chapter 7.5 - Slaughter of Animals

SPECIFIC COMMENTS

(Proposed text)

Article 7.5.2 Moving and Handling Animals
2. Specific Considerations for Poultry

(Last paragraph)
The number of *poultry* arriving at the processing plant with broken bones and/or dislocated joints should be recorded in a manner that allows for verification. ~~For *poultry*, the percentage of chickens with broken or dislocated wings should not exceed 2%, with less than 1% being the goal (under study)~~.

(Rationale)

Japan would like to reiterate its proposal at the 78th General Session to delete the specific numbers.

Japan considers that it is difficult to find scientific evidence for the included numeric value. One possible study to find scientific evidence for these numbers would be an epidemiological study to compare the percentages of broken or dislocated wings between farms/transporters of good practice and poor practice. However, Japan believes that it is still difficult to find common numbers, considering the variety of practice on moving and handling livestock and cultural background of 176 Member countries.

It should be noted that Members are able to refer to their own appropriate national, sectoral or perhaps regional norms when they need specific numbers for benchmarking performance, without any numeric restriction of the OIE.

(Proposed text)

Article 7.5.4 Care of Animals in Lairages

14. Waiting time should be minimised ~~and should not exceed 12 hours~~.

(Rationale)

It is our common understanding that the Animal Welfare Code should be developed based on science. Feasibility is one of the aspects that should be taken into consideration, however it is inappropriate to include numeric value only because some Member countries may be able to comply with the number. Japan also believes that OIE does not have enough data to judge whether this number is feasible or not to all the Member countries.

3. Chapter 11.5 - BSE

GENERAL COMMENTS

Japan fully supports the approach made by Dr. Tiermann at the 78th General Session and would like to thank the OIE for ensuring an opportunity for member countries to provide their written comments for this issue. We have a view that full consultation is essential before adoption, especially for those topics which are highly controversial among Member countries.

SPECIFIC COMMENTS

(Proposed text)

Japan supports the original text (the Code of 2010 version) and requests that it is maintained as it is.

Article 11.5.14
Recommendations on commodities that should not be traded

2. From cattle that were at the time of slaughter over 30 months of age originating from a country, zone or compartment defined in Article 11.5.4., the following commodities, and any commodity contaminated by them, should not be traded for the preparation of food, feed, fertilisers, cosmetics, pharmaceuticals including biologicals, or medical devices: brains, eyes, spinal cord, skull and vertebral column. Protein products, food, feed, fertilisers, cosmetics, pharmaceuticals or medical devices prepared using these commodities (unless covered by other Articles in this chapter) should also not be traded.
3. From cattle that were at the time of slaughter over 12 months of age originating from a country, zone or compartment defined in Articles 11.5.5., the following commodities, and any commodity contaminated by them, should not be traded for the preparation of food, feed, fertilisers, cosmetics, pharmaceuticals including biologicals, or medical devices: brains, eyes, spinal cord, skull and vertebral column. Protein products, food, feed, fertilisers, cosmetics, pharmaceuticals or medical devices prepared using these commodities (unless covered by other Articles in this chapter) should also not be traded.

(Rationale)

For revision proposed in the Code Commission report of the February 2010 meeting, the Code Commission revised the text with the rationale of "the key issue for BSE risk management was the age of cattle at the time of slaughter, not the BSE status of the country."

Japan does not support this rationale because the risk of SRM derived from cattle should not be considered equal between the countries with the undetermined BSE status and those with the controlled BSE status, because the risk in cattle in countries with undetermined BSE status is uncertain.

Japan would like to emphasise that it is necessary to put the same degree of importance on "the age of cattle at the time of slaughter" and "BSE status of the country" as the key issues for BSE risk management. Japan reiterates the importance of considering "BSE status of the country," unless the Code Commission has new scientific knowledge to justify the

rationale for focusing on age at time of slaughter.

In addition, Japan has a view that vertebral column which is normally difficult to be separated from dorsal root ganglion (DRG) should be considered as high risk as other central nerve system (CNS). This view is supported by the latest EFSA risk assessment[1] which states that DRG contains the same level of ID $_{50}$ as other CNS.

[1] Opinion of the Scientific Panel on Biological Hazard on the revision of the Geographical BSE risk assessment (GBR) methodology. 2007. The EFSA Journal 463.1-35.