

Japan's Comments on The Terrestrial Animal Health Standards Commission and The Aquatic Animal Health Standards Commission Reports of the February 2018 meeting

Japan would like to express its appreciation to the Terrestrial Animal Health Standards Commission (TAHSC), the Aquatic Animal Health Standards Commission (AAHSC) and other relevant Commissions, Working Groups and ad hoc Groups for all the works they have done. Japan also appreciates the TAHSC and AAHSC for providing us the opportunity to comment on the proposed revisions to the texts of Terrestrial Animal Health Code and Aquatic Animal Health Code.

Please find our comments on the following texts and Annex:

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AQUATIC ANIMAL HEALTH CODE

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TERRESTRIAL ANIMAL HEALTH CODE

1. CHAPTER 1.4. ANIMAL HEALTH SURVEILLANCE

Proposal of amendment to Article 1.4.5. Early warning systems (insertion)

Article 1.4.5.

Early warning systems

An early warning system is essential for the timely detection, reporting and communication of occurrence, incursion or emergence of diseases, *infections* or *infestations*, should be under the control of the *Veterinary Authority* and should include the following:

- 1) appropriate coverage of target *animal populations* by the *Veterinary Services*;
- 2) *laboratories* capable of diagnosing and differentiating relevant *infections* or *infestations*;
- 3) training and awareness programmes for *veterinarians*, *veterinary paraprofessionals*, livestock owners or keepers and others involved in handling *animals* from the farm to the *slaughterhouse/abattoir*, for detecting and reporting unusual animal health incidents;
- 4) a legal obligation by relevant stakeholders to report unusual animal health incidents including suspected cases or cases of *notifiable diseases* or *emerging diseases* to the *Veterinary Authority* with following information:

Rationale

For consistency with 3), Japan would like to propose to revise as above.

Japan believes this amendment also contributes to clarification of targets for the immediate report, if a disease is not known or clinical signs are unclear.

2. CHAPTER 4.Z. INTRODUCTION TO RECOMMENDATIONS FOR DISEASE PREVENTION AND CONTROL

Proposal of amendment to Article 4.Z.1. (insertion)

Article 4.Z.1.

[...]

Prerequisites for ~~devising~~ developing such programmes may include:

- quality *Veterinary Services* including legislative framework, ~~and~~ *laboratory capacity and adequate and committed funding*;
- cooperation among relevant authorities such as Ministries which are responsible for public health and wild life;
- appropriate education to secure *veterinarians* and *veterinary paraprofessionals*;
- close link with research institutions;
- effective awareness of and active cooperation with, private stakeholders and the media;
- public-private partnerships;
- regional cooperation among *Veterinary Authorities* on transboundary animal diseases.

Rationale

For consistency with other chapters, Japan believes that cooperation among relevant authorities such as ministries which are responsible for public health, wild life should be included in the list of prerequisites.

Also, the media must be in the list. Since they are indispensable when Veterinary Authority disseminates information to citizen, and they may come to the infected area such as a firm in question.

3. CHAPTER 15.1. AFRICAN SWINE FEVER

Comments to Article 15.1.3. Country or zone free from ASF

Article 15.1.3.

Country or zone free from ASF

[...]

Commodities of domestic or captive wild pigs can be traded safely in accordance with the relevant articles of this chapter from countries free from ASF in domestic and captive wild pigs, even if they notify infection with ASFV in wild or feral pigs or African wild suids.

Comments

Japan can admit that putting the last sentence of the article 3, understanding meeting all the criteria in article 2 is sufficiently strict from the scientific point of view.

However, in reality, it is extremely difficult to separate the domestic and the wild pig populations by appropriate biosecurity. Even in the EU, it is shown that to protect domestic pig from the infected wild animal is difficult.

So, it is quite important for member countries to clarify 'appropriate biosecurity' to execute this chapter smoothly.

Japan understands the OIE commenced the observatory project, and the OIE should provide thoughts on 'appropriate biosecurity' for better implementation of this chapter by member countries.

4. CHAPTER 1.6. PROCEDURES FOR PUBLICATION OF A SELF-DECLARATION OF DISEASE FREEDOM, RECOGNITION OF AN OFFICIAL DISEASE STATUS AND FOR ENDORSEMENT OF AN OFFICIAL CONTROL PROGRAMME RECOGNITION BY THE OIE

Comments to Chapter 1.6.

Comments

Japan supports the OIE for setting criteria for publication of the self-declaration of the freedom. Since Japan believes member countries are responsible on information to submit to the OIE for claiming its freedom of particular diseases, and the OIE is not responsible for the self-declaration as mentioned in this article.

If the member countries could declare and disseminate it freely, the other member countries have to evaluate it by themselves and that costs a lot for evaluating country. Therefore, Japan believes that the appropriate criteria for self-declaration contributes safer and smoother implementation of this chapter

5. CHAPTER 8.14. INFECTION WITH RABIES VIRUS

Comment

Japan understands new category for country or zone free from dog-mediated rabies, but OIE must be careful not to increase risk for human health by setting the new category.

For example, Japan believes that, even in the country or zone free from dog-mediated rabies, post-exposure vaccine must be conducted as long as rabiesvirus exist in the country or zone. Setting the new category may entail the misunderstanding that post-exposure vaccine in the country or zone free from dog-mediated rabies is unnecessary.

Please find the Annex I which is the list of other technical comments from Japan to this chapter.

6. PROPOSAL TO ESTABLISH NEW CHAPTER FOR LABORATORY DIAGNOSIS.

Proposal

Japan would like to propose to establish new code for laboratory diagnosis.

Japan understands that the OIE is making details of the rules for early detection in the chapter 1.4 and the new chapter 4.Y being discussed. Results of laboratory diagnosis are the first step for the actions followed by these codes.

Also, new articles for the self-declaration are being established and Japan understands the number of the self-declaration by member countries would be increased in the near future. However, if diagnosis-tests were not properly conducted, the self-declaration could be a cause of disruption.

Therefore, Japan would like the OIE to commence discussion about setting a new code for laboratory diagnosis.

AQUATIC ANIMAL HEALTH CODE

7. ARTICLE 2.2 INFECTION WITH KOI HERPESVIRUS

(Article 2.2.2.) Species with incomplete evidence for susceptibility

- a) Species for which there is incomplete evidence for susceptibility according to Chapter 1.5. of the Aquatic Code include: ~~Gold fish~~ goldfish (*Carassius auratus*), grass carp (*Ctenopharyngodon idella*) and Syberian crucian carp (*Carassius carassius*).

Rationale:

Japan proposes to revise as above to align the expressions with other chapter.
It seems it is a typo.

(Article 2.2.3.) Susceptible stages of the host

- a) All age groups of fish, from juveniles upwards, appear to be susceptible to infection with KHV (Bretzinger *et al.*, 1999; Sano *et al.*, 2004) but, under experimental conditions, 2.5–6 g fish were more susceptible than 230 g fish (Perelberg *et al.*, 2003). Carp larvae are resistant to infection with KHV but the same carp were susceptible to infection on maturation. (Ito *et al.*, 2007)

Rationale:

The reference is inserted into appropriate position.

Annex I

Proposed OIE code revision on Chapter 8. 14 (infection with rabies virus)

Comment No.	Article No.	OIE's proposal	Japan's comments
1	Article 8.14.1	Rabies is a disease caused by neurotropic viruses of the genus Lyssavirus in the family Rhabdoviridae of the order Mononegavirales and is transmissible to all mammals. Members of the orders Carnivora and Chiroptera are considered to be the main reservoir hosts.	
		Rabies virus, the Lyssavirus formerly referred to as 'classical rabies virus, genotype-1', is found worldwide, and is responsible for the vast majority of reported animal and human rabies cases. The most common source of exposure of humans to rabies virus is the dog.	
		<u>Other lyssavirus species</u> have more restricted geographical and host range, with the majority having been isolated from bats, with limited public and animal health implications.	According to the first and second paragraph of this Article, whether the "other lyssavirus species" are responsible pathogen of Rabies. And it is unclear the disease caused by "other lyssavirus" are considered as rabies in this chapter as the name of this chapter name is Infection with RABIES VIRUS. If OIE considers that it is appropriate to remain this paragraph, it should be mentioned that other lyssavirus species is not to be considered or is to be considered as Rabies virus by adding a sentence or paragraph after this paragraph.
2		dog-mediated rabies is defined as any infection with rabies virus maintained in the dog population independently of other animal species, as determined by <u>epidemiological studies</u>	The term of epidemiological studies seems to be unclear. Therefore, Japan would like clarify the details of epidemiological studies.

Annex I

Comment No.	Article No.	OIE's proposal	Japan's comments
3	Article 8. 14. 2	Country or zone free from infection with rabies virus 1) A country or zone may be considered free from infection with rabies virus when: a) the disease is notifiable and any change in the epidemiological situation or relevant events are reported in accordance with Chapter 1.1.; b) all susceptible animals showing clinical signs suggestive of rabies are subjected to appropriate field and laboratory investigations ;	Japan propose the amendment of the paragraph as follows because animals that is not showing clinical signs should also be subjected to appropriate field and laboratory investigations. b) all suspected cases susceptible animals showing clinical signs suggestive of rabies are subjected to appropriate field and laboratory investigations; Also, Japan would like some clarification on the details of field investigations.
4		c) an ongoing system of surveillance in accordance with Chapter 1.4. and Article 8.14.9. has been in place for the past 24 months, with a minimum requirement being an early warning system to ensure investigation and reporting of animals suspected of being infected; d) regulatory measures for the prevention of rabies are implemented in accordance with the relevant recommendations in the Terrestrial Code including Articles 8.14.4. to 8.14.7. ; e) no case of indigenously acquired infection with rabies virus has been confirmed during the past 24 months.	Japan would like clarification on what articles are also included as relevant recommendations of OIE Terrestrial Code other than 8.14.4 to 8.14.7.
5			The deletion of the current sub-paragraph 5) is not acceptable, the reason of which is as follows: 1) The proposal will allow countries to be able to maintain its free status even if there have been cases in imported animals. 2) At the same time, it is interpretable that any occasional case of rabies in the dog population in an importing country, which has been subsequently occurred due to imported animals with rabies, will not affect rabies free status, because such a case will not be considered as the case of indigenously acquired infection with rabies virus in accordance with this proposed paragraph. # Current sub-paragraph 5 is as follows: 5) no imported case in the Orders Carnivora or Chiroptera has been confirmed outside a quarantine station for the past six months.
6		2) Preventive vaccination of at-risk animals does not affect the rabies free status.	Japan supports adding this new paragraph but definition of "at-risk animals" should be indicated in this article, otherwise there would be any possible discrepancy in its interpretation among OIE Members, which may cause controversy among them.

Annex I

Comment No.	Article No.	OIE's proposal	Japan's comments
7	Article 8.14.2.ter	<p>Country or zone free from dog-mediated rabies</p> <p>1) A country or zone may be considered free from dog-mediated rabies when:</p> <p>a) <u>dog-mediated rabies is a notifiable disease and any change in the epidemiological situation or relevant events are reported in accordance with Chapter 1.1.;</u></p> <p>b) an ongoing system of surveillance in accordance with Chapter 1.4. and Article 8.14.9. has been in place for the past 24 months, with a minimum requirement being an early warning system to ensure control, investigation and reporting of animals suspected of infection with rabies virus;</p> <p>c) regulatory measures for the prevention of rabies are implemented in accordance with the relevant recommendations in the Terrestrial Code <u>including</u> Article 8.14.9.;</p> <p>d) no case of indigenously acquired dog-mediated rabies has occurred during the past 24 months;</p> <p>e) a programme for the management of stray dog populations is implemented in accordance with Chapter 7.7.</p>	<p>Concerning the sub-paragraph a) and d) of paragraph 1), as Rabies has a wide range of reservoir hosts, the target animals subject to each sub-paragraph should be indicated.</p> <p>It should be understood that wild mammals such as raccoon and skunk are subject to the notification of the disease, and that any case in wild mammals is considered as a case of indigenously acquired dog-mediated rabies as far as there exists Rabies which is maintained in the dog population because dogs may easily transmit Rabies to other species. This point should be clarified to avoid misinterpretation of this article.</p> <p>Regarding b), Japan would like clarification on why "control" is included here and not in Article 8.14.2 1c.</p> <p>Regarding c), Japan would like clarification on what articles are referred by "relevant recommendations in the Terrestrial Code", and Japan considers importation measures, at least Article 8.14.5 should also be included.</p>
8	Article 8.14.6	<p>Recommendations for importation of other susceptible animals from countries or zones considered infected with rabies virus</p> <p>Veterinary Authorities should require the presentation of an international veterinary certificate attesting that the animals:</p> <p>1) showed no clinical sign of rabies on the day prior to or on the day of shipment;</p> <p>2) either</p> <p>a) were kept for the 6 months prior to shipment in <u>an establishment</u> where there has been no case for at least 12 months prior to shipment;</p> <p>OR</p> <p>b) were vaccinated or revaccinated in accordance with the recommendations of the manufacturer. The vaccine was produced and used in accordance with the Terrestrial Manual;</p> <p>3) if domestic animals, were permanently identified and the identification number stated in the certificate.</p>	<p>Regarding 2)a), Japan proposes an additional phrase be added "were kept for the 6 months prior to shipment in an establishment <u>where separation from susceptible animals was maintained and</u> where there has been no case for at least 12 months prior to shipment: "</p> <p>Rationale: The same wording as the current Article 8.14.9 (deleted in the proposed version) should be kept to ensure that that the establishment is free from rabies.</p>