

Japan's comments on the Code Commission Report of the February 2013 meeting

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

1. Criteria for the inclusion of diseases and infections on the OIE List (Chapter 1.2.)

General comments

Based on the discussion we had at the last OIE General Session, Japan would request again, in relation to the specific comments below, that the TAHSC improve the clarity of the following terms in the criteria for listing diseases (hereafter referred to as 'the listing criteria'). We believe that this is a necessary process for each Member Country to share common understanding of the terms and to reach consensus for listing/delisting with more transparency:

- 'Significant' morbidity
- 'Significant' mortality
- 'Reliable' means of detection and diagnosis

'Significant' morbidity and 'significant' mortality should be objectively defined by rate (in percentage terms). And taking possible future discussions into account, 'reliable' means of detection and diagnosis should be defined by sensitivity and specificity as well. Japan has been hoping that the TAHSC can propose us quantitative definition of these terms.

Specific comments

(1) Vesicular stomatitis and swine vesicular disease

Japan thinks vesicular stomatitis (VS) and swine vesicular disease (SVD) meet the listing criteria as we consider more than 30-40 % morbidity rate as sufficient significant one.

i) VS

- *OIE Terrestrial Manual* states high mortality rates in pigs affected by the New Jersey strain of VS virus have been observed.

- It is reported that 97.1% of horses in low North Pacific dry area of Costa Rica were positive for New Jersey strain by the virus neutralization test (J. Vet. Diagn. Invest. 2002 Sep; 14(5): 438-41).
- Studies have determined that 45% of horses that seroconvert have observable clinical signs (Can. Vet. J. Volume 39, January 1998).

ii) SVD

- The epizootiological survey of the SVD outbreaks in Japan in 1973, 46% of pigs examined showed vesicular lesions on their feet and 80% of the pigs housed in affected sheds showed high levels of neutralizing antibody titers (Nat. Inst. Anim. Hlth. Quart. 15, 165-173 (1975)).
- Morbidity rates of up to 60% were recorded when SVD outbreaks were occurred in Britain in 1972 (Nature Vol. 241 February 23 1973)
- Morbidity rates of more than 40 % were observed in Italy in 1995, 1996 and 1998 (Rev. sci. tech Off. Int. Epiz., 26 (3)).

If the TAHSC has different views from ours, we would submit comments to suggest revision of parts of the criteria with alternatives at next opportunity as we strongly believe it is unnecessary to exclude current listed diseases that have been effectively contained within limited certain areas, as we stated at the last General Session (Final report 2013, Item 257, p.63).

Japan would like to draw TAHSC's attention that it is inappropriate to exempt Member countries from notification duty on diseases which have been contained within limited certain areas and to impose the responsibility of scientific explanation of the reasons on importing countries free from the diseases.

(2) Infection with Schmallerberg virus

We would highly appreciate Director General and the President of the TAHSC has announced to review infection of Schmallerberg virus according to the listing criteria. In reviewing against the listing criteria, we would like to ask the TAHSC to pay specific attention to the nature of the disease causing abortion/stillbirth of pregnant cattle as we assume different approach in defining 'significant' 'morbidity and mortality' may be necessary. In this regard, we would suggest TAHSC's consideration to our idea that fetal mortality could be defined as the 'mortality'.

(3) Infection with *Trichinella spp*

One of the listing criteria is that at least one country has demonstrated freedom or impending freedom from the disease, infection or infestation in populations of susceptible animals.

If the TAHSC considers infection with *Trichinella spp* meets the listing criteria, we would request the TAHSC to propose addition of the requirements for country free status or negligible risk status in the Chapter. If almost every country has the pathogen at least in wildlife and it is difficult to present evidence for country freedom, the disease may need to be delisted.

2. General Principles for Animal Disease Control (Chapter 4.X.)

Specific comments

Article 4.X.1.

Introduction and objectives

This chapter is intended to help Member Countries identify priorities, objectives and the desired goal of *disease* control programmes for animal diseases and zoonoses in endemic, *outbreak* or emergency situations. Disease Such control programmes are often established with the aim of eventual eradication of agents at a country, *zone* or *compartment* level. While this approach is desirable, the needs of stakeholders may require a broader range of outcomes. For some *diseases*, eradication may not be economically or practically or economically feasible and options for sustained mitigation of *disease* impacts may be needed.

Rationales

It would be better to clearly describe zoonoses.

When we elaborate control programmes for animal diseases or zoonoses, we usually emphasize practical feasibility more than economic one.

3. Infection with Foot and Mouth Diseases Virus (Chapter 8.5.)

Specific comments

Article 8.5.1.

1) For the purposes of the *Terrestrial Code*, foot and mouth disease (FMD) is defined as an *infection* of animals of the suborder *ruminantia* and of the family *suidae* of the order *Artiodactyla*, and *Camelus bactrianus* with foot and mouth disease virus (FMDV).

2) The following defines the occurrence of FMDV infection:

Detection in a sample from an animal listed above, of the virus, viral antigen, nucleic acid or virus-specific antibodies that are not a consequence of vaccination by a test as specified in the *Terrestrial Manual*.

3) The following defines the occurrence of FMDV circulation:

Transmission of FMDV, as demonstrated by clinical signs or change in virological or serological status indicative of recent *infection*.

4) For the purposes of the *Terrestrial Code*, the incubation period of FMD shall be 14 days.

~~5) Many different species belonging to diverse taxonomic orders are known to be susceptible to *infection* with FMDV. Their epidemiological significance depends upon the degree of susceptibility, the husbandry system, the density and extent of populations and the contact between them. Amongst *Camelidae* only Bactrian camels (*Camelus bactrianus*) are of sufficient susceptibility to have potential for epidemiological significance. South American camelids and dromedaries are not considered of epidemiological importance.~~

~~6) *Infection* with FMDV can give rise to disease of variable severity and to FMDV circulation. FMDV infection in ruminants may persist leading to carriers. Although live FMDV can be recovered from carriers, transmission of FMDV from these carriers has not been proven, except from African buffalo (*Syncerus caffer*).~~

Rationales

We are of the opinion that article 1 of each chapter should describe only:

- ① Matters necessary for following specific articles in the chapter; and

② Facts that have been scientifically confirmed on the disease.

i) Epidemiological significance

We think the description of ‘epidemiological significance’ is unnecessary and species to be covered in this Chapter 8.5 should be defined based only on the degree of susceptibility and infective ability because:

- ① The value of proposed concept of the ‘epidemiological significance’ for FMD prevention and control has not yet scientifically demonstrated and thus cannot be applicable to many Member Countries’ different situations as OIE normative code, as mentioned () below; and
- ② It is not needed for interpreting following articles because it is not cited at all hereafter.

The scientific conclusions indicating Arabian camels and South American camelids not considered of epidemicological importance are based on husbandry systems and the environment of their habitats where the studies took place. Husbandry systems, densities and extents of animal populations and contacts/natural barriers between livestock (cattle/swine) and camels/camelids, however, can vary largely between the countries where the studies took place and countries where they are possibly imported.

And we would like to encourage the OIE continue to work for collecting relevant information and data on susceptibility and infective ability to livestock (cattle/swine) of each species and propose to add new species to be covered in this chapter if considered appropriate.

ii) FMDV carriers

The description about FMDV carriers is unnecessary with the same reasons.

Specific comments

Article 8.5.4.

FMD free compartment

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2) declare for the FMD free compartment that:

- a) there has been no outbreak of FMD during the past 12 months; when vaccination is carried out, during the past two years;
- b) no evidence of FMDV infection has been found during the past 12 months;
- c) either
 - i) no vaccination against FMD has been carried out during the past 12 months; no vaccinated animal has been introduced during the past 12 months; or
 - ii) compulsory systematic vaccination is carried out and the vaccine used complied with the standards described in the Terrestrial Manual, including appropriate vaccine strain selection;

Rationales

When compulsory systematic vaccination is carried out in the compartment, the conditions for FMD free compartment should be consistent with ones for FMD free country or zone where vaccination is practised.