

## **Japan's comments on The Code Commission report of the September 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 have done and thank 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, infections and infestations on the OIE List (Chapter 1.2.)**

#### **General comments**

The TAHSC has decided the deletion of the words 'under study' from Article 1.2.3 in spite of Japan's latest comments against the delisting of vesicular stomatitis (VS) and swine vesicular disease (SVD) with scientific evidences. We are deeply concerned about that, although the TAHSC requires provision of scientific rationale to Member Countries, the TAHSC did not provide Member Countries with scientific rationale for the determination including response to our comments.

The TAHSC referred to the report of the September 2013 meeting of the Scientific Commission as a ground of the determination. We need to point out, however, that the report mentions nothing about the delisting of the two diseases including our scientific comments.

Japan would like to reiterate that OIE and Member Countries should maintain the monitoring of diseases that international societies have actively prevented and controlled as international important diseases for a long time and successfully contained within limited certain areas.

Special attention should be given to the fact that, at the last General Session, a number of Member Countries, Japan, P.R. China, Russia, Belarus, Uruguay, Peru, Jamaica, India and Guatemala (on behalf of the Americas), expressed their opposition to the delisting of VS and SVD.

We sincerely hope that the TAHSC will provide Member Countries with rationale for its determination and make every effort to reach agreement by consensus at the next General Session.

In addition, we would like to insist again that 'significant' morbidity and 'significant' mortality should be objectively defined as basic concepts for fruitful discussion. We consider that VS and SVD meet the listing criteria as they have shown more than 30-40% morbidity, while the TAHSC has considered that they do not meet the criteria because the morbidity is not 'significant'. The argument on this issue should be kept in a scientific manner.

## Specific Comments

### Article 1.2.2.

The criteria for the inclusion of a *disease, infection* or *infestation* in the OIE list are as follows:

- 1) International spread of the agent (via live *animals* or their products, *vectors* or formites) has been proven.

AND

- 2) At least one country has demonstrated freedom or impending freedom from the *disease, infection* or *infestation* in populations of susceptible *animals*, based on the animal health surveillance provisions of the *Terrestrial Code*, in particular those contained in Chapter 1.4.

AND

3)

- a) Natural transmission to humans has been proven, and human infection is associated with severe consequences.

OR

- b) The *disease* has been shown to, or scientific evidence indicates that it would, cause significant morbidity or mortality in domestic animals at the level of a country or a zone.

OR

- c) The *disease* has been shown to, or scientific evidence indicates that it would, cause significant morbidity or mortality in wild animal populations.

## Rationale

Once high but now low morbidity or mortality diseases may regain high pathogenicity. The proposed text of amendment means diseases which once had high morbidity or mortality in domestic animals should be maintained in the OIE list in spite of their current pathogenicity. We should continue to be vigilant against such diseases that caused remarkable damage to a country or a zone in the past.

## Specific comments

### Article 1.2.3.

The following *diseases, infections* and *infestations* are included in the OIE list.

In case of modifications of this list of animal *diseases, infections* and *infestations* adopted by the World Assembly, the new list comes into force on 1 January of the following year.

- 1) The following are included within the category of multiple species *diseases, infections* and *infestations*:
  - Infection with *Trichinella* spp (under study)
  - ~~Vesicular stomatitis (under study)~~ Vesicular stomatitis
- 5) The following are included within the category of swine diseases and infections:
  - ~~Swine vesicular disease (under study)~~ Swine vesicular disease

## Rationale

### *Infection with Trichinella spp*

We would like to suggest infection with *Trichinella* spp be put ‘under study’ for further discussion. Japan has to express doubts about whether the infection is suitable as an OIE listed disease.

A sentence in the report of the September 2013 meeting of the TAHSC should be noted: *Further, experts of the ad hoc Group advised that they had been unable to develop plausible globally applicable conditions to be fulfilled to support a claim for country or zone freedom from Trichinella spp.*

Japan thinks that, if that is the case, this means no country or zone can demonstrate its freedom from *Trichinella* spp in populations of susceptible animals at a level of confidence acceptable to all Member Countries. We could not, therefore, consider that the infection meets the listing criteria according to Item 2 of Article 1.2.2.

It is inconsistent that, while the TAHSC strictly interpreted the listing criteria to delist VS and SVD, it has made too simply hasty a decision to terminate an effort

to develop the conditions for freedom from *Trichinella* spp.

### Vesicular stomatitis and swine vesicular disease

As mentioned in the Japan's comments submitted in August, 2013, it was reported that 97.1% of horses in low North Pacific dry area of Costa Rica were seropositive for New Jersey strain of VS (J. Vet. Diagn. Invest. 2002 Sep; 14(5): 438-41) and morbidity rates of up to 60% were recorded when SVD outbreaks occurred in Britain in 1972 (Nature Vol. 241 February 23 1973).

These scientific evidences indicate that VS and SVD would have high morbidity in domestic animals at a level of country or zone, which means the diseases meet the revised criteria proposed by Japan (see the first specific comments on Article 1.2.2.).

## **2. Animal welfare and dairy cattle production systems (Draft Chapter 7.X)**

### **General comments**

Japan appreciates all the efforts undertaken also by the working group on animal welfare and the *ad hoc* groups in revising and drafting the texts.

We support the current work in preparation, inter alia, for a new chapter for “animal welfare and dairy cattle production systems” but regret to say the consultation period was too short for the first draft proposed at the TAHSC February meeting in 2013.

In view of its importance for the stakeholders, Japan requests to set the deadline for Member Country's written comments same as that for the other texts, in August instead of June, to allow more time for consultation.

Japan also notes the OIE should respect “the normal cycle for the adoption of new texts in the Codes is two years” as prescribed in the “Procedures used by the OIE to set standards and recommendations for international trade, with a focus on the terrestrial and aquatic animal health codes”<sup>1</sup>.

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