

Japan's Comments on The Code Commission Report of the September 2015 meeting

Japan would like to express appreciation to the Terrestrial Animal Health Standards Commission (TAHSC) and other relevant Commissions, Working Groups and ad hoc Groups for all the works they have done and thanks the TAHSC for giving us the opportunity of offering comments on proposed revisions to the text of Terrestrial Animal Health Code.

Please find our comments on the following texts:

1. Glossary
2. Chapter 1.1. Notification of Diseases, Infections and Infestations, and Provision of Epidemiological Information
3. Chapter 3.2. Evaluation of Veterinary Services
4. Chapter 6.8. Monitoring of the Quantities and Usage Patterns of Antimicrobial Agents in Food-producing Animals
5. Chapter 15.3. Infection with *Taenia Solium*
6. Chapter 7.10. Animal Welfare and Broiler Chicken Production Systems
7. Chapter 7.11. Animal Welfare and Dairy Cattle Production Systems
8. Chapter 7.X. Welfare of Working Equids
9. Chapter 8.8. Infection with Foot and Mouth Disease Virus
10. Chapter 8.X. Infection with Mycobacterium Tuberculosis Complex
11. Chapter 15.1. Infection with African Swine Fever Virus
12. Chapter X.X. Criteria for Assessing the Safety of Commodities
13. Chapter 14.7. Infection with Peste des Petitis Ruminants Virus

1. Glossary

OIE STANDARD

means a text that has been formally adopted by the OIE World Assembly of Delegates according to Article 50, 51 and 52 of the OIE General Rules, and published by the OIE as the OIE Terrestrial Animal Health Code, the OIE Aquatic Animal Health Code, the OIE Manual of Diagnostic Tests and Vaccines for Terrestrial Animals or the OIE Manual of Diagnostic Tests for Aquatic Animals. ; and that describes requirements, recommendations, criteria, specifications and characteristics that should be used consistently to ensure the improvement of animal health veterinary public health and animal welfare worldwide.

OIE GUIDELINE

means a text an OIE publication that provides advice to improve animal health, veterinary public health and animal welfare worldwide and that has been endorsed by an OIE Specialist Commission or the OIE Council, and published by the OIE as an OIE publication or on the OIE Website but has not been formally adopted by the OIE World Assembly of Delegates.

(Rationale)

The word 'formally' should be changed to more concrete description such as 'according to Article 50, 51 and 52 of the OIE General Rules'. The OIE Terrestrial Code includes not only requirements, recommendations, criteria, specifications and characteristics, but also other types of texts such as definitions, principles, and considerations which we have recognised as OIE standards. We think it is impossible and unnecessary to give an exhaustive list of texts currently recognized as OIE standards or OIE guidelines and to give them one definition such as 'advice to improve animal health, veterinary public health and animal welfare worldwide'. To avoid unnecessary confusion of Member Countries, the simpler and more concrete definitions are the better.

2. Chapter 1.1 Notification of Diseases, Infections and Infestations, and Provision of Epidemiological Information

Article 1.1.1.

For the purposes of the *Terrestrial Code* and in terms of Article 5.9 and 10 of the OIE Organic Statutes, Member Countries shall recognise the right of the *Headquarters* to communicate directly with the *Veterinary Authority* of its territory or territories.

All *notifications* and all information sent by the OIE to the *Veterinary Authority* shall be regarded as having been sent to the country concerned and all *notifications* and all

information sent to the OIE by the *Veterinary Authority* shall be regarded as having been sent by the country concerned.

For the purposes of this chapter, 'event' means a single *outbreak* or a group of epidemiologically related *outbreaks* of a given *disease, infection* or *infestation* that is the object of a *notification*. An event is specific to a pathogen and strain, when appropriate, and includes all related *outbreaks* reported from the time of the immediate *notification* through to the final report. **Notification Reporting** of an event includes host species, number and geographical distribution of affected animals and *epidemiological units*.

(Rationale)

According to the Glossary, '*notification*' means the procedure by which the *Veterinary Authority* informs the *Headquarters* and the *Headquarters* inform the *Veterinary Authorities* of the occurrence of an *outbreak* of *disease* or *infection*, according to the provisions of Chapter 1.1. Hence, the term '*Notification* of an event' should not be used. In addition, it is not provided in Chapter 1.1 as the responsibility of Member Countries to inform an event to the Headquarters.

Article 1.1.5.

- 2) An *infected zone* shall be considered as such until ~~a period specified in the *Terrestrial Code* has elapsed after the last reported case, and when appropriate *biosecurity* measures and *surveillance* have been applied to prevent possible recurrence or spread of the *disease, infection* or *infestation*. These measures are the country comply with the conditions for free status~~ described in the relevant disease-specific chapters of the *Terrestrial Code*.

(Rationale)

The conditions that 'a period specified in the *Terrestrial Code* has elapsed after the last reported case, and when appropriate *biosecurity* measures and *surveillance* have been applied to prevent possible recurrence or spread of the *disease, infection* or *infestation*' are the same as the ones for free status described in the relevant disease-specific chapters of the *Terrestrial Code*.

3. Chapter 3.2. Evaluation of Veterinary Services

Article 3.2.14.

7. Veterinary legislation, regulations and functional capabilities
- b) Export and import inspection

- i) Assessment of the adequacy and implementation of relevant national legislation concerning:
- veterinary public health controls of the production, processing, storage and transportation of *meat* for export;
 - veterinary public health controls of production, processing, storage and marketing of fish dairy products and other food of animal origin for export;
 - animal health and veterinary public health controls of the export and import animals, animal genetic material, animal products, animal feedstuffs and other products subject to veterinary inspection;
 - **animal welfare controls at export and import of animals**
 - animal health controls of the importation, use and bio-containment of organisms which are aetiological agents of animal diseases, and of pathological material;
 - animal health controls of importation of veterinary biological products including vaccines;
 - administrative powers available to Veterinary Services for inspection and registration of facilities for veterinary control purposes (if not included under other legislation mentioned above);
 - documentation and compliance.

(Rationale)

The paragraph is inconsistent with other related provisions of Terrestrial Code because animal welfare controls at export and import of animals are not described in item 6 on veterinary legislation in Article 3.1.2 on fundamental principle of quality of Veterinary Services and item 2 on export and import inspection in Article 3.2.7. on legislation and functional capabilities of Veterinary Services: *the Veterinary Authority should have appropriate legislation and adequate capabilities to prescribe the methods for control and to exercise systematic control over the import and export processes of animals and animal products in so far as this control relates to sanitary and zoosanitary matters.*

4. Chapter 6.8. Monitoring of the Quantities and Usage Patterns of Antimicrobial Agents in Food-producing Animals

Article 6.8.1.

Definition and Purpose

For the purposes of this chapter, therapeutic use of antimicrobial agents means the administration of antimicrobial agents to animals for treating and controlling infectious diseases.

The purpose of these recommendations is to describe an approach to the monitoring of the quantities of antimicrobial agents used in food-producing animals.

In order to evaluate antimicrobial exposure in food-producing animals, quantitative information should be collected to monitor usage patterns by animal species, antimicrobial agents or class, type of use (therapeutic or non-therapeutic) and route of administration.

(Rationale)

It is unnecessary to define the term of 'therapeutic use of antimicrobial agents' because the term is not used in this chapter at all.

5. Chapter 15.3. Infection with *Taenia Solium*

Article 15.3.3.

Measures to prevent and control of infection with *T. solium*

(2nd paragraph)

The Veterinary Authority or other Competent Authorities should promote the following measures:

1. Prevention of infection in of pigs

Transmission of *T. solium* eggs from humans to pigs can be avoided by:

- a) preventing pigs from the exposure of pigs to the environments contaminated with human faeces such as by providing adequate toilet and sanitation facilities for people in pig rearing establishments;

The Veterinary Authority or other Competent Authorities should discourage the following practices:

- b) preventing the use of human faeces as pig feed;
or the use of pigs as a means of human faeces disposal;
- c) preventing the use of untreated sewage effluent to irrigate or fertilise land to

~~be used by pigs for forage or for food crops of pigs; the effluent should be~~

- d) ~~ensuring that any treated sewage effluent used to irrigate or fertilise land to used by pigs for forage or for food crops has been~~ treated in a manner shown to inactivate *T. solium* eggs;
- e) ~~providing adequate toilet and sanitation facilities for people in pig rearing establishments to prevent the exposure of pigs and their environment to human faeces.~~

The optimal prevention programme should include detection and treatment of human tapeworm carriers.

(Rationale)

The proposed text is prescribed by using 'can' but this item should include any recommendation for prevention of infection of pigs with *T. solium*.

2. Control of infection in of pigs

(7th paragraph)

~~An optimal control programme should include detection and treatment of human tapeworm carriers and control of sewage used for agricultural production.~~

(Rationale)

The detection and treatment of human tapeworm carriers and control of sewage are effective for the prevention rather than control of infection of pigs with *T. solium*.

6. Chapter 7.10. Animal Welfare and Broiler Chicken Production Systems

Article 7.10.4.

Recommendations

1. Biosecurity and animal health

a) Biosecurity and disease prevention

~~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 *Biosecurity* programmes should be designed and implemented to maintain a flock at a particular health status and to prevent the entry (or exit) of

~~specific infectious agents, commensurate with the best possible 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 OIE standards recommendations found in the Terrestrial Code.~~

(Rationale)

The term of 'biosecurity' has been defined in the Glossary: *biosecurity means a set of management and physical measures designed to reduce the risk of introduction, establishment and spread of animal diseases, infections or infestations to, from and within an animal population.* The phrase of 'commensurate with the best possible flock health status and current disease risk (endemic and exotic or transboundary) that is specific to each epidemiological group of broilers' is so conceptual that it is not appropriate description for recommendation, and can be omitted from the text for simplification.

b) Animal health management, preventive medicine and veterinary treatment

~~Animal health management means a system designed to optimise the health and welfare of the broilers. It includes prevention, treatment and control of diseases and adverse conditions.~~

(Rationale)

The term of 'animal health management' has been defined in the Glossary: *animal health management means a system designed to optimise the physical and behavioural health and welfare of animals; It includes the prevention, treatment and control of diseases and conditions affecting the individual animal and herd, including the recording of illness, injuries, mortalities and medical treatments where appropriate.*

2. Environment and management

k) Choice of broiler strain

~~Welfare and health considerations should be balance any decisions on productivity and growth rate when choosing a b~~Broiler strains should be decided for particular locations or production systems, taking into considerations the balance between animal health and welfare, and productivity and growth rate.

(Rationale)

Rhetorical correction and clarification.

7. Chapter 7.11. Animal Welfare and Dairy Cattle Production Systems

Article 7.11.6.

Recommendations on system design and management including physical environment

When new facilities are planned or existing facilities are modified, professional advice on design in regards to animal health and welfare and health should be sought.

Many aspects of the environment can impact the health and welfare and health of dairy cattle. These include thermal environment, air quality, lighting, noise, etc.

(Rationale)

'Animal health' is not part of but a key requirement of 'animal welfare'. We have to consider, therefore, 'animal health' before 'animal welfare'. According to the Glossary, *an animal is in good state of welfare if it is healthy, comfortable, well nourished, safe, able to express innate behaviour, and if it is not suffering from unpleasant states such as pain, fear and distress*. Without ensuring animal health, we could not ensure animal welfare.

8. Draft Chapter 7.X. Welfare of Working Equids

Article 7.X.3.

Responsibilities

6. Owners and users are ultimately responsible for ensuring the welfare of their working equids according to the relevant principles and recommendations for animal welfare in OIE Terrestrial Code, by ensuring their animals' 'five freedoms'.

(Rationale)

We think the 'five freedoms' are not OIE standards but one of the internationally recognised principles. It is inappropriate to quote only the specific principle.

Article 7.X.4.

Criteria or measurables for the welfare of working equids

Although there is no single measure of *animal welfare*, ~~focusing on issues that improve animal health and cater for the needs of working equids~~ it will bring about improvements

in *animal welfare* in practice to focus on issues that improve animal health and cater for the needs of working equids. These criteria would and ensure that legislators can make evidence-based decisions.

(Rationale)

Clarification

1. Behaviour

Presence or absence of certain equine behaviours could indicate an animal welfare problem, including fear, depression or pain. Behaviours differ between donkeys, horses, and mules and donkeys and a good understanding of normal behaviour of each species is required.

(Rationale)

The order of species should be consistent with the one in first paragraph of Article 7.X.2.

4. Body condition and physical appearance

Poor or changing body condition or physical appearance may be an indicator of compromised animal welfare and health and welfare and scoring systems help to provide objectivity.

(Rationale)

Since the scoring systems are not provided in this chapter, the sentence that 'scoring systems help to provide objectivity' is unnecessary.

Article 7.X.6.

Feeding and provision of water

1. Feeding

~~Working equids are natural grazers that eat little and often. Their natural diet is mainly grasses, which have a high roughage content. Horses should be provided frequently with a predominantly fibre-based diet: either grass, hay or suitable and safe alternative in order to mimic their natural feeding patterns as closely as possible.~~

~~Energy, fibre, protein, mineral (including trace minerals) and vitamin contents in the~~

diet of working equids, their balance, safety, digestibility and availability are major factors determining the power of the animals, their growth and overall productivity and their health and welfare.

Working equids should be provided with access to an appropriate quantity and quality of balanced and safe feed with energy, fibre, protein, mineral (including trace minerals) and vitamin contents of adequate quality to meet their physiological and working needs.

In case of feed shortages, ~~the~~ *animal handler* should avoid feed shortage or starvation ensure that the period of reduced feeding is as short as possible and that implement mitigation strategies including slaughter, sale or relocation of the animals, or humane killing are implemented if welfare and health or welfare is are at risk of being compromised.

If supplementary feed is not available, steps should be taken to avoid starvation, including *slaughter, sale or relocation of the animals, or humane killing*.

Working equids should be provided frequently with a predominantly fibre-based diet; need some of their nutrient requirements to be met by grass, fresh, green forage, hay or suitable and safe alternative, in order to satisfy their physiological needs. For this purpose, owners and handlers should allow them to graze or forage whenever possible and to take allow for an adequate number of working breaks to allow the animals eat. Cut green forage should be provided when grazing is not possible. Long fibre forage is important as well as green forage and should also be provided even when green forage is not available. Long fibre hay is better than chopped forage.

Since ~~inadequate~~ diets and feeding systems that may contribute to *diseases*, stress, and discomfort or to abnormal behaviour in working animals equids, they should be avoided. *Animal handlers* should be aware of the importance of the animal's nutritional needs and consult an expert for advice on ration formulation and feeding programmes when needed.

(Rationale)

Since it is developed by pasting the references on, this item can be simplified by excluding redundancies and duplications. As for the first paragraph, working equids are not natural but domestic. As they are domestic, their diet is maybe mainly grasses or maybe mainly artificial feeds.

Article 7.X.7.

Shelter

2. Cold stress

~~Protection from extreme cold weather conditions~~ Working equids, particularly of neonates, young equids or others that are physiologically compromised, should be ~~provided~~ protected from extreme cold weather conditions when these are likely to create a serious risk to ~~the~~ their welfare ~~of equids, particularly of neonates and young animals and others that are physiologically compromised.~~ Such a protection could be provided by natural or man-made shelter structures. Care ~~must~~ should be taken that, in an attempt to protect against the cold, ventilation and air quality are not compromised. ~~Animal handlers should also ensure that equids have access to adequate feed and water during cold weather.~~

(Rationale)

The OIE Codes usually do not use 'must' in their recommendations. The last sentence duplicates point 1 of Article 7.X.6. Animal handlers should ensure equids have access to adequate food and water not only during cold weather but always.

Article 7.X.8.

Management of diseases and injuries

1. Biosecurity and disease prevention

Biosecurity plans should be designed by, promoted with, and implemented by, stakeholders, commensurate with the desired health status of the equid population ~~of~~ herd and current disease risk ~~and for~~ of *listed diseases*, in accordance with relevant recommendations of the *Terrestrial Code*. These biosecurity plans should address the control of the major sources and pathways for spread of pathogens by:

(Rationale)

Rhetorical collection and duplication

2. Animal health management

~~Animal health management means a system designed to optimise the physical and behavioural health and welfare of the working equid. It includes the prevention, treatment and control of diseases and conditions affecting the individual animal and herd, including the recording of illness, injuries, mortalities and medical treatments where appropriate.~~

(Rationale)

The term of '*animal health management*' has been defined in the Glossary: *animal health management means a system designed to optimise the physical and behavioural health and welfare of animals; It includes the prevention, treatment and control of diseases and conditions affecting the individual animal and herd, including the recording of illness, injuries, mortalities and medical treatments where appropriate.*

Article 7.X.9.

Handling

(6th paragraph)

Working equids should not be tethered or hobbled continuously. In situations where temporary hobbling is necessary, the animal handlers should ensure sufficient distance between the two hobbled legs is required to allow the equid to stand as naturally as possible.

The tethering site should provide access to appropriate feed and water and be free from obstructions that may entangle the tether. Adequate water, feed and supervision should be provided: if necessary, action may should be taken if necessary by moving to move the animals to areas providing shade or shelter.

(Rationale)

The second sentence of the 6th paragraph should include a recommendation. Hobbling which does not allow the equids to stand naturally should be prohibited at any situation. It is inappropriate to line water, feed and supervision up in a row.

Article 7.X.10.

Behaviour

Animal handlers should be familiar with normal and abnormal behaviour of each type of working equid in order to interpret the welfare implications of what is being observed.

Good Human-animal interaction should be positive established in order not to compromise the welfare of the working equid.

(Rationale)

Clarification

Article 7.X.11.

End of working life

Consideration should be given to end of working life issues.

Abandonment of working equids should be prohibited discouraged. The *Competent Authorities* should be responsible for developing and implementing guidance or legislation encouraging slaughter, sale for other purposes, or humane killing after the end of working life to prevent abandonment of equids unless legislation prohibit the abandonment while taking steps to make provisions for abandoned animals which would ensure their welfare.

(Rationale)

Japan thinks the abandonment of equids should be prohibited, preferably by law, for ensuring the welfare of working equids after the end of working life.

Article 7.X.12.

Appropriate workloads

Animal handlers should provide the working equids with breaks with drinkable water at least every two hours, and ensure the equids work a maximum of six hours per day and are given at least one full day's rest in every seven-day period (preferably two).

Animal handlers should establish and adjust appropriate workloads of equids based on the outcome based measurables in this Article, taking into account the following:

- young age: equids less than two years of age should not be used as working equids because equids continue to develop until over the age of five years and excessive work in too young in life may contribute to leg and back injuries in later life, resulting in a much reduced working life. When working life commences should be preferably three years of age or more;
- old age; special considerations should be given to old equids.
- parturition; mares should not be ridden or worked three months before and after foaling;
- sick and injured: any equids that has been under veterinary treatment should not be returned to work without permission by the veterinarian;
- weather conditions: works should be reduced in very hot weather.

Equids continue to develop until over the age of five years so consideration should be given, according to workload, as to when working life commences. In general this should be three years of age or more but never less than two years of age. Animals that are subjected to excessive work too young in life will usually suffer from leg and back injuries in later life, resulting in a much reduced working life.

Mares should not be ridden or worked three months before and after foaling.

Special considerations should be given to old animals.

Animals should work a maximum of six hours per day and should be given at least one full day's rest in every seven-day period (preferably two). Consideration should be given to the animal's physical condition and age and the work load should be adjusted accordingly.

Consideration should be given to the weather conditions (work should be reduced in very hot weather). Breaks should be given at least every two hours and drinkable water should be provided.

All animals should receive sufficient good quality feed corresponding to their individual requirements. Drinkable water and roughage should be available to aid digestion.

Sick or injured animals should not be worked. Any animal that has been under veterinary treatment should not be returned to work until advised by the veterinarian.

(Rationale)

This article should be more clarified and concrete as recommendations. As for the 6th paragraph on feed, this paragraph duplicates point 1 of Article 7.X.6. As for the last paragraph on sick and injured animals, the first sentence is inconsistent with the second sentence because there may be slight sick or injured animals that the veterinarian admits to return to work.

Article 7.X.13.

Farriery and harnessing

2. Harnessing

(4th paragraph)

Carts should be maintained to ensure accurate balancing and appropriate tyre pressure. It is recommended that For draught animals equids the use of swingletrees is recommended so as to balance the pull and thus as a result reduce

the risk of sores from the harness.

Owners should ~~are responsible for~~ ensuring that ~~effective welfare-friendly harnessing is~~ complied with this Article ~~accompanied by good riding and driving practices.~~

(Rationale)

We cannot imagine the description 'effective welfare-friendly harnessing' and 'good riding and driving practices' concretely. The 5th paragraph on owner's responsibility is lack of concreteness.

9. Chapter 8.8 Infection with Foot and Mouth Disease Virus

Article 8.8.21.

Recommendations for importation from countries or zones free from FMD where vaccination is practiced

For fresh meat and meat products of ruminants and pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that the entire consignment of *meat* comes from animals which:

- 1) have been kept in the country or zone free from FMD where vaccination is practised, or which have been imported in accordance with Article 8.8.10., Article 8.8.11. or Article 8.8.12.;

(Rationale)

Since the main clause ends at 'which', the 'which' might be unnecessary.

10. Draft Chapter 8.X. Infection with Mycobacterium Tuberculosis Complex

Article 8.X.4.

Country or zone free from infection with *M. tuberculosis* complex in bovids

- 1) To qualify as free from *infection* with *M. tuberculosis* complex in bovids, a country or *zone* should satisfy the following requirements:
 - a) *infection* with *M. tuberculosis* complex in animals is a *notifiable disease* in the entire country;
 - b) regular testing of all herds domestic and captive wild bovid populations has

been in place for at least three years and for the past three years this testing has demonstrated that *infection* with *M. tuberculosis* complex was not present in at least 99.8 % of the herds populations representing at least 99.9 % of the domestic and captive wild bovids in the country or zone;

- c) a surveillance programme is in place to detect infection with *M. tuberculosis* complex in domestic and captive wild bovid populations in the country or zone through ante- and post-mortem inspection as described in Chapter 6.2.;

(Rationale)

Clarification

Article 8.X.5.

Country or zone free from infection with *M. tuberculosis* complex in cervids

- 1) To qualify as free from *infection* with *M. tuberculosis* complex in cervids, a country or zone should satisfy the following requirements:
 - a) *infection* with *M. tuberculosis* complex in animals is a *notifiable disease* in the entire country;
 - b) regular testing of all herds domestic and captive wild cervid populations has been in place for at least three years and for the past three years this testing has demonstrated that *infection* with *M. tuberculosis* complex was not present in at least 99.8 % of the herds populations representing at least 99.9 % of the domestic and captive wild cervids in the country or zone;
 - c) a surveillance programme is in place to detect infection with *M. tuberculosis* complex in domestic and captive wild cervid populations in the country or zone through ante- and post-mortem inspection as described in Chapter 6.2.;

(Rationale)

Clarification

Article 8.X.6.

Herd Compartment free from infection with *M. tuberculosis* complex in bovids or cervids

- 1) To qualify as free from *infection* with *M. tuberculosis* complex in bovids or cervids, a herd compartment of bovids or cervids should satisfy the following requirements:

- a) the herd compartment is in a country or zone free from *infection* with *M. tuberculosis* complex in bovids or in cervids and is certified as free from *infection with M. tuberculosis complex in domestic and captive wild bovid or cervid populations* by the *Veterinary Authority*;

OR

- b) the herd compartment meets the following conditions:
- i) *infection* with *M. tuberculosis* complex in animals is a *notifiable disease* in the entire country;
 - ii) no evidence of *infection* with *M. tuberculosis* complex has been detected in domestic and captive wild bovid or cervid populations of the herd compartment for at least the past 12 months;
 - iii) domestic and captive wild bovids or cervids in the herd compartment have shown no clinical signs of *infection* with *M. tuberculosis* complex or lesions at ante- or post-mortem inspection for at least the past 12 months;
 - iv) two tests have been performed with negative results at a minimum interval of six months on all bovids or cervids over six weeks of age in domestic and captive wild bovid or cervid populations of the herd compartment at the time of testing. The first test was performed at least six months after the removal of the last case;
 - v) bovids or cervids and their germplasm introduced into the herd compartment comply with Articles 8.X.7., 8.X.10., 8.X.11. and 8.X.12.;
 - vi) for at least the past 12 months, there has been no evidence of *infection* with *M. tuberculosis* complex in other *herd* of the same establishments compartment or measures have been implemented to prevent any transmission of *infection* with *M. tuberculosis* complex from these other *herds*;

(Rationale)

According to the Glossary, *herd* means a number of animals of one kind together under human control or a congregation of gregarious wild animals. The term of 'herd', therefore, includes feral and wild animal populations and cannot be used in the context of this Article. We think the term of 'compartment' is more suitable to this article because the term includes surveillance, control and biosecurity measures, which need to gain and maintain the free status. According to the Glossary, *compartment* means an animal subpopulation contained in one or more establishments under a common biosecurity management system with a distinct health status with respect to a specific disease or

specific diseases for which required surveillance, control and biosecurity measures have been applied for the purpose of international trade.

2) To maintain the free status, either:

a) the requirements in point 1a) are met;

OR

b) the requirements in point 1b) i) to iii), v) and vi) are met and domestic and captive wild bovids or cervids in the herd compartment:

i) showed a negative result to an annual test to ensure the continuing absence of *infection* with *M. tuberculosis* complex

OR

ii) showed a negative result to a test every two years to ensure the continuing absence of *infection* with *M. tuberculosis* complex if it has been confirmed that the annual infection rate percentage of herds infected with *M. tuberculosis* complex of domestic and captive wild bovid or cervid populations is not more than 1 % of all herds in the country or zone during the past two years;

OR

iii) showed a negative result to a test every three years to ensure the continuing absence of *infection* with *M. tuberculosis* complex if it has been confirmed that the annual infection rate percentage of herds infected with *M. tuberculosis* complex of domestic and captive wild bovid or cervid populations is not more than 0.2 % of all herds in the country or zone during the past four years;

OR

iv) showed a negative result to a test every four years to ensure the continuing absence of *infection* with *M. tuberculosis* complex if it has been confirmed that the annual infection rate percentage of herds infected with *M. tuberculosis* complex of domestic and captive wild bovid or cervid populations is not more than 0.1 % of all herds in the country or zone during the past six years;

(Rationale)

See the rationale for item 1 of Article 8.X.6.

Article 8.X.7.

Recommendations for the importation of bovids and or cervids for breeding or rearing

Veterinary Authorities of importing countries should require the presentation of an *international veterinary certificate* attesting that the bovids and or cervids:

- 1) showed no clinical signs of *infection* with *M. tuberculosis* complex on the day of shipment;
- 2) either:
 - a) originate from a herd free from infection with *M. tuberculosis* complex that is in a country or zone free from infection with *M. tuberculosis* complex in bovids or cervids; or
 - b) originate from a herd compartment free from *infection* with *M. tuberculosis* complex in bovids or cervids and have been tested for *infection* with *M. tuberculosis* complex with negative results within 30 days prior to shipment; or
 - c) have been isolated for at least 90 days prior to shipment including ~~protection~~ protected from contact with animal reservoirs of *M. tuberculosis* complex and all isolated animals showed negative results to at least two consecutive tests carried out at a six-month interval, with the second test performed within 30 days prior to shipment.

(Rationale)

The bovids or cervids which originate from the country or zone free from infection with *M. tuberculosis* complex in bovids or cervids complying with the provisions of Article 8.X.4 or 8.X.5 are considered as free from infection with *M. tuberculosis* complex and do not have to originate from the herd. In addition, as mentioned in the rationale for Article 8.X.6, the concept of a 'herd' free from infection with *M. tuberculosis* complex is not suitable in the context of this Chapter.

Article 8.X.8

Recommendations for the importation of goats for breeding or rearing

Veterinary Authorities of importing countries should require the presentation of an *international veterinary certificate* attesting that:

- 1) *infection* with *M. tuberculosis* complex in animals is a *notifiable disease* in the entire

country;

- 2) the goats showed no clinical signs of *infection* with *M. tuberculosis* complex on the day of shipment;
- 3) the goat were kept since birth in herds domestic and captive wild goat populations in which no case of *infection* with *M. tuberculosis* complex has been detected for the past three years.

(Rationale)

We should consider that the goat may be temporarily kept in the herd. Unless effective tests are available for live goats, the goat should be kept for sufficient period in free areas to ensure the safety. In addition, as mentioned in the rationale for Article 8.X.6, the term of 'herd' is not suitable in the context of this Chapter.

Article 8.X.9.

Recommendations for the importation of bovids and cervids to be transported directly for slaughter

Veterinary Authorities of importing countries should require the presentation of an *international veterinary certificate* attesting that the bovids and or cervids:

- 1) showed no clinical signs of *infection* with *M. tuberculosis* complex on the day of shipment;
- 2) either:
 - a) originate from a country, zone or herd compartment free from *infection* with *M. tuberculosis* complex in bovids or cervids; or
 - b) are not being culled as part of an eradication programme against *infection* with *M. tuberculosis* complex and were tested for *infection* with *M. tuberculosis* complex with negative results within 30 days prior to shipment.

(Rationale)

Given that most bovids and cervids imported are slaughtered in the end, the title should be clarified. In addition, as mentioned in the rationale for Article 8.X.6, the term of 'herd' is not suitable in the context of this Chapter.

Article 8.X.10.

Recommendations for the importation of semen of bovids

Veterinary Authorities of importing countries should require the presentation of an *international veterinary certificate* attesting that:

- 1) the donor males showed no clinical signs of *infection* with *M. tuberculosis* complex on the day of collection of the semen;
- 2) the donor males either;
 - a) were kept in an *artificial insemination centre* complying with the provisions of Chapter 4.5.; ~~or and~~
 - b) ~~were kept in a herd free from infection with M. tuberculosis complex and showed negative results to at least two consecutive tests carried out at a six-month interval, with the second test performed within 30 days prior to collection of the semen annually and the semen was collected, processed and stored in conformity with the provisions of Article 4.5.3. to 4.5.5. and Article 4.6.5. to 4.6.7.;~~
- 3) ~~the semen was collected, processed and stored in conformity with the provisions of Article 4.5.3. to 4.5.5. and Article 4.6.5. to 4.6.7.~~

(Rationale)

For the purpose of international trade, all semen should be collected in an artificial insemination centre complying with the provisions of Chapter 4.5. and collected, processed and stored in conformity with the relevant Articles of the Terrestrial Code. Given that many animals may not show clinical signs of infection with *M. tuberculosis* complex on the day of collection of semen, the tests should be carried out to ensure the safety of the semen whenever possible.

Article 8.X.11.

Recommendations for the importation of semen of cervids

Veterinary Authorities of importing countries should require the presentation of an *international veterinary certificate* attesting that:

- 1) the donor males showed no clinical signs of *infection* with *M. tuberculosis* complex on the day of collection of the semen;
- 2) the donor males either;
 - a) were kept in an artificial insemination centre complying with the provisions of

Chapter 4.5. or a herd compartment free from *infection* with *M. tuberculosis* complex in cervids in a country or zone free from *infection* with *M. tuberculosis* complex and which only accepts cervids from free herds in a free country, or zone; or and

- b) were kept in a herd free from infection with *M. tuberculosis* complex and showed negative results to tests carried out during an isolation period of 30 days in the artificial insemination centre or the compartment prior to collection of the semen annually and the semen was collected, processed and stored in conformity with the provisions of Article 4.5.3. to 4.5.5. and Article 4.6.5. to 4.6.7.;

3) the semen was collected, processed and stored in conformity with the provisions of Article 4.5.3. to 4.5.5. and Article 4.6.5. to 4.6.7.

(Rationale)

For the purpose of international trade, the semen should be collected in an artificial insemination centre complying with the provisions of Chapter 4.5. and collected, processed and stored in conformity with the relevant Articles of the Terrestrial Code as long as possible. When the point b) v) of item 1 of Article 8.X.6 is complied with, the limitation of 'which only accepts cervids from free herds in a free country or zone' is unnecessary. Given that many animals may not show clinical signs of infection with *M. tuberculosis* complex on the day of collection of semen, the tests should be carried out to ensure the safety of the semen whenever possible. When the tests prescribed in point 2)b) are carried out, the limitation of 'in a country or zone free from *infection* with *M. tuberculosis* complex' in point 2)a) is too much. In addition, as mentioned in the rationale for Article 8.X.6, the term of 'herd' is not suitable in the context of this Chapter.

Article 8.X.12.

Recommendations for the importation of embryos of bovids and or cervids

Veterinary Authorities of importing countries should require the presentation of an *international veterinary certificate* attesting that:

- 1) the donor females either; showed no clinical signs of infection with *M. tuberculosis* complex on the day of collection of the embryos;

2) the donor females:

- a) originate from were kept in a herd compartment free from *infection* with *M. tuberculosis* complex in bovids or cervids in a country or zone free from *infection* with *M. tuberculosis* complex; or and
- b) were kept in a herd free from infection with *M. tuberculosis* complex, and were

~~subjected to a test for infection with *M. tuberculosis* complex with~~ showed
negative results to tests carried out during an isolation period of 30 days in the
~~establishment~~ compartment of origin prior to collection of the embryos;

3) the embryos were collected, processed and stored in accordance with the relevant provisions of Chapters 4.7. to 4.9.

(Rationale)

It is the minimum condition for ensuring the safety of embryos that the donor females showed no clinical signs of infection with *M. tuberculosis* complex on the day of collection of the embryos. In addition, given that many animals may not show clinical signs of infection with *M. tuberculosis* complex on the day of collection of the embryos, the tests should be carried out to ensure the safety of the semen when possible. When the tests prescribed in point 2) b) are carried out, the limitation of 'in a country or zone free from infection with *M. tuberculosis* complex' in point 2) a) is too much. In addition, as mentioned in the rationale for Article 8.X.6, the term of 'herd' is not suitable in the context of this Chapter.

Article 8.X.13

Recommendations for the importation of milk and milk products of bovids

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

- 1) ~~have been~~ were derived from bovids which showed no clinical signs of infection with *M. tuberculosis* complex;
- 2) either:
 - a) were derived from bovids in a herd compartment free from infection with *M. tuberculosis* complex in bovids; or
 - b) were subjected to pasteurization or any combination of control measures with equivalent performance as described in the Codex Alimentarius Code of Hygienic Practice for Milk and Milk Products.

(Rationale)

It is the minimum condition for ensuring the safety of milk and milk products that the milked females showed no clinical signs of infection with *M. tuberculosis* complex. In addition, as mentioned in the rationale for Article 8.X.6, the term of 'herd' is not suitable in the context of this Chapter.

Article 8.X.14

Recommendations for the importation of milk and milk products of goats

Veterinary Authorities of importing countries should require the presentation of an international veterinary certificate attesting that:

- 1) infection with *M. tuberculosis* complex in animals is a notifiable disease in the entire country;
- 2) either:
 - a) and the milk or milk products have been were derived from goats kept since birth in herds compartments in which no case of infection with *M. tuberculosis* complex in domestic and captive wild goats has been detected for the past three years; or
 - OR**
 - b) the milk or milk products were subjected to pasteurization or any combination of control measures with equivalent performance as described in the Codex Alimentarius Code of Hygienic Practice for Milk and Mild Products.

(Rationale)

Unless effective tests are available for live goats, the goats should be kept for sufficient period in free areas to ensure the safety. In addition, as mentioned in the rationale for Article 8.X.6, the term of 'herd' is not suitable in the context of this Chapter.

11. Chapter 15.1. Infection with African Swine Fever Virus

Article 15.1.1.

General provisions

(12th paragraph)

~~A Member Country should not impose bans on the trade in commodities of domestic or captive wild pigs in response to a notification of infection with ASFV in wild or feral pigs or African wild suids provided that Article 15.1.2. is implemented.~~

(Rationale)

We note that TAHSC added a description "the domestic and captive wild pig population should be separated from the wild and feral pig and African wild suid populations and from Ornithodoros ticks" in Article 15.1.2. in proposed revisions. However, we are still

concerned about the 12th paragraph of Article 15.1.1. and it should be more carefully considered in comparison with CSF which is not tick-borne disease, and thus, Japan would like to suggest removing it.

While it makes sense in theory to secure freedom of domestic pig population by shutting off the transmission route, it is difficult in practice to demonstrate that necessary measures have been taken in a sufficient manner at a country or zone level. This is also relevant to importing countries when they assess the situation of the exporting country. In view of known research reports and the situation of the eastern Europe in recent years, it is obvious that an importing country would have great difficulty in preventing the entry of, and in eradicating ASF once it entered, due to its complex transmission route (e.g. involvement of vectors), clinical characteristics (e.g. persistent infection) and the lack of vaccine. Therefore, an importing country should be warranted to take necessary risk mitigation measures including import ban upon the ASF occurrence in wild pigs in the exporting country. Japan would like to reiterate that any other Code chapter on vector-borne disease does not have such text.

Article 15.1.2.

General criteria for the determination of the ASF free status of a country, zone or compartment

1. ASF is a *notifiable disease* in the entire country, and all suids showing clinical signs suggestive of ASF are should be subjected to appropriate field and *laboratory* investigations in accordance with related OIE standards;
2. aAn ongoing awareness programme is should be in place to encourage reporting of all suids showing clinical signs suggestive of ASF;
3. tThe *Veterinary Authority* has should have current knowledge of, and authority over, all domestic and *captive wild pig herds populations* in the country, zone or compartment;
4. tThe *Veterinary Authority* has should have current knowledge of the species of wild wild suids present, their distribution, and habitat in the country or zone;
5. fFor domestic and *captive wild* pigs, an appropriate surveillance programme should be in place in accordance with Articles 15.1.22. to 15.1.27. is in place;
6. fFor *wild* and *feral* pigs, and for African *wild* suids, if present in the country or zone, a *surveillance* programme is should be in place in accordance with Article 15.1.26., taking into account the presence of natural and artificial boundaries, the ecology of the *wild* and *feral* pig and African *wild* suid populations and an assessment of the risk of disease ASF spread including the presence of *Ornithodoros* ticks;

7. ~~b~~Based on the assessed *risk* of spread of ASF within the *wild* and *feral* pig and African *wild* suid populations, and surveillance in accordance with Article 15.1.26., the domestic and *captive wild* pig population should be separated by appropriate measures biosecurity from the *wild* and *feral* pig and African *wild* suid populations and from *Ornithodoros* ticks.

(Rationale)

Since the old first sentence that '*the African swine fever (ASF) status of a country, zone or compartment can only be determined after considering the following criteria in domestic and wild pigs, as applicable:*' has been deleted, each point in this article is lifted up in the air and should be amended appropriately as the criterion. As for item 1, the word of 'appropriate' lacks specificity and should be changed to more concrete description such as 'in accordance with related *OIE standards*'. As for item 3, the word of 'population' is used more generally than '*herd*' in this chapter. As for item 7, because it is defined in the Glossary, the term of 'biosecurity' is more specific than 'appropriate measures'. According to the Glossary, *biosecurity means a set of management and physical measures designed to reduce the risk of introduction, establishment and spread of animal diseases, infections or infestations to, from and within an animal population.*

Article 15.1.3.

Country or zone free from ASF

1. A country or *zone* may be considered free from ASF without formally applying a specific *surveillance* programme in accordance with Article 15.1.22. to 15.1.27. if when it complies with the provisions of point 1 of Article 1.4.6. and all the criteria of Article 15.1.2. are complied with.

(Rationale)

Since the old first sentence of Article 15.1.2 that '*the African swine fever (ASF) status of a country, zone or compartment can only be determined after considering the following criteria in domestic and wild pigs, as applicable:*' has been deleted, the compliance with the general criteria of Article 15.1.2 should be provided as a condition of a country or zone free from ASF. Otherwise the criteria would be left up in the air.

2. A country or zone which does not meet the conditions of point 1 above may be considered free from ASF when it complies with all the criteria of Article 15.1.2. and when:

1) *surveillance* in accordance with Articles 15.1.22. to 15.1.27. has been in place

for the past three years:

2) there has been no outbreak of ASF during the past three years; this period can be reduced to 12 months when the surveillance demonstrates there is no evidence of tick involvement in the epidemiology of the infection:

3) imported pig commodities comply with the recommendations of Articles 15.1.5. to 15.1.17.

(Rationale)

The proposed points 1 and 2 of Article 15.1.3. are conditions for 'historical free status' and 'free status in domestic and captive wild pigs', respectively. Between them, we could establish conditions for 'free status (in pigs including wild and feral pigs) which does not meet the conditions of historical free status' in the same way as other OIE listed diseases.

2. A country or zone which does not meet the conditions of point 1 above may be considered free from ASF in domestic and captive wild pigs when it complies with all the criteria of Article 15.1.2. and when:

1) surveillance in accordance with Articles 15.1.22. to 15.1.27 has been in place for the past three years:

2) there has been no outbreak of ASF in domestic or captive wild pigs during the past three years; this period can be reduced to 12 months when the surveillance demonstrates there is no evidence of tick involvement in the epidemiology of the infection;

1) surveillance in accordance with Articles 15.1.22. to 15.1.27 has been in place for the past 12 months;

3) imported pigs and pig commodities comply with the requirements recommendations of Articles 15.1.5. to 15.1.17.

(Rationale)

The compliance with the general criteria of Article 15.1.2 should be also provided as a condition of a country or zone free from ASF in domestic and captive wild pigs. As for the period of the surveillance, we need at least three year-surveillance to prove there has been no outbreak of ASF during the past three years. As for point c), the term of 'commodity' includes live animal according to the Glossary, and Articles 15.1.5 to 15.1.17 are recommendations.

Article 15.1.9.

Recommendations for importation from countries or zones not free from ASF

For semen of domestic and captive wild pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that:

- 1) the donor males:
 - a) were kept since birth or for at least three months prior to collection in an *establishment*, in which the surveillance in accordance with Articles 15.1.22. to 15.1.27 demonstrates no case of ASF has occurred in the past three years; this latter period can be reduced to 12 months when the surveillance demonstrates there is no evidence of tick involvement in the epidemiology of the infection;

(Rationale)

Clarification and consistency with Article 15.1.3.

Article 15.1.11.

Recommendations for importation from countries or zones not free from ASF

For *in vivo* derived embryos of domestic pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that:

- 1) the donor females:
 - a) were kept since birth or for at least three months prior to collection in an *establishment*, in which the surveillance in accordance with Articles 15.1.22. to 15.1.27 demonstrates no case of ASF has occurred in the past three years; this period can be reduced to 12 months when the surveillance demonstrates there is no evidence of tick involvement in the epidemiology of the infection;

(Rationale)

Clarification and consistency with Article 15.1.3.

Article 15.1.12.bis

Recommendations for importation from countries or zones not free from ASF

For fresh meat of domestic and captive wild pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that:

- 1) the entire consignment of *fresh meat* comes from animals which have been slaughtered in an approved *slaughterhouse/abattoir*, have been subjected with favourable results to ante- and post-mortem inspections in accordance with Chapter 6.2.;
- 2) **either:**
 - a) the entire consignment of *fresh meat* comes from animals which originated from **herds establishments** in which **the surveillance in accordance with Articles 15.1.22. to 15.1.27 demonstrates** no case of ASF has occurred in the past three years; **this period can be reduced to 12 months when the surveillance demonstrates there is no evidence of tick involvement in the epidemiology of the infection;** and samples from a statistically representative number of animals were tested for ASF, with negative results, **in accordance with OIE standards;** or
 - b) **appropriate** samples have been collected from every animal slaughtered, **and been** tested for ASF, with negative results, **in accordance with OIE standards.**

(Rationale)

Clarification and consistency with Article 15.1.3.

Article 15.1.13.

Recommendations for importation of fresh meat of wild and feral pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that:

- 1) the entire consignment of *fresh meat* comes from animals which have been subjected with favourable results to a post-mortem inspection in accordance with Chapter 6.2. in an **examination centre facility** approved by the *Veterinary Authority* for export purpose;
- 2) if the country or the *zone* where the animal has been killed does not comply with the conditions of ~~point 1 of Article 1.4.6.,~~ **Article 15.1.3.,** or is adjacent to a country or *zone* with an unknown infection status or with infection in *wild* or *feral* pigs or African *wild* suids, **appropriate** samples have been collected from every animal killed, **and**

tested for ASF, with negative results, in accordance with OIE standards.

(Rationale)

If the term of 'examination centre' is used in this Chapter, it should be clarified because it is not used generally. It is enough in this Chapter to use a general noun or 'facility' in place of 'examination centre'.

Article 15.1.16.

Recommendations for the importation of bristles from pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that these products:

- 1) originated from domestic or *captive wild* pigs in a country, *zone* or *compartment* free from ASF and have been processed in an establishment facility approved by the *Veterinary Authority* for export purpose; or

OR

- 2) have been processed in an establishment facility approved by the *Veterinary Authority* for export purposes so as to ensure the destruction of ASFV in accordance with one of the processes listed in Article 15.1.21.bis, and that were subjected to the necessary precautions were taken after processing to avoid contact of the product with any source of ASFV.

(Rationale)

The word of 'establishment' should not be used in the context of this article to avoid unnecessary confusion among Member Countries because, according to the Glossary, the term of 'establishment' has been defined as '*the premises in which animals are kept*'. Generally, animals are not kept in processing facilities.

Article 15.1.17.

Recommendations for the importation of litter and manure from pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that these products:

- 1) originated from domestic or *captive wild* pigs in a country, *zone* or *compartment* free from ASF; or

OR

- 2) have been processed in an establishment facility approved by the *Veterinary Authority* for export purposes so as to ensure the destruction of ASFV in accordance with one of the processes listed in Article 15.1.21.ter, and that were subjected to the necessary precautions were taken after processing to avoid contact of the product with any source of ASFV.

(Rationale)

See the rationale for Article 15.1.16.

Article 15.1.17.bis

Recommendations for the importation of skins hides and trophies from pigs

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that these products:

- 1) originated from domestic or *captive wild* pigs in a country, zone or compartment free from ASF and have been processed in an establishment facility approved by the *Veterinary Authority* for export purpose; or

OR

- 2) have been processed in an establishment facility approved by the *Veterinary Authority* for export purposes so as to ensure the destruction of ASFV in accordance with one of the processes listed in Article 15.1.21., and that were subjected to the necessary precautions were taken after processing to avoid contact of the product with any source of ASFV.

(Rationale)

See the rationale for Article 15.1.16.

Article 15.1.17.ter

Recommendations for the importation of other pig products

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that these products:

- 1) originated from domestic or *captive wild* pigs in a country, zone or compartment free from ASF and have been prepared in an processing establishment facility approved

by the *Veterinary Authority* for export purpose;

OR

- 2) have been processed in an establishment facility approved by the *Veterinary Authority* for export purposes so as to ensure the destruction of ASFV, and that were subjected to the necessary precautions were taken after processing to avoid contact of the product with any source of ASFV.

(Rationale)

See the rationale for Article 15.1.16.

12. Chapter X.X. Criteria for Assessing the Safety of Commodities

Chapter X.X.

CRITERIA FOR ASSESSING THE SAFETY OF COMMODITIES

(Rationale)

Simplification, taking the contents of this Chapter into account.

Article X.X.1.

Assessing the safety of animal products from a country or zone not free from a specific listed disease General provisions

For the purpose of this chapter the word 'safety' is applied only to animal health considerations for *listed diseases* *Terrestrial Code*, safe commodity has been defined as a commodity which can be traded without the need for risk mitigation measures specifically directed against a particular listed disease, infection or infestation and regardless of the status of the country or zone of origin for that disease, infection or infestation.

The OIE aims to include an article listing the safe commodities at the beginning of each In many disease-specific chapters in Section 8 to 15, Article X.X.2. lists animal products that can be traded from a country or zone not free from the specific listed disease. When a list of safe commodities is present in a chapter, importing countries should not apply trade restrictions to such commodities with respect to the agent in question. If an importing country imposes any trade restrictions to the safe commodities, it should conduct a risk analysis to justify the measure in accordance with OIE standards.

The criteria for safe commodities inclusion of *animal products* in the list of safe

commodities are based on the absence of the pathogen in hazard identification and risk assessment of the commodities, traded animal products,

This chapter only considers biological agents in commodities among hazards with the potential to cause adverse health effects on animal or humans, and their related risks.

When no hazard in question is always identified in the commodities either due to its absence in the tissues from which the animal products are derived or to its inactivation, by the processing or treatment that the animal products have undergone the commodities are assessed as safe commodities.

The assessment risk assessment of the safety of the animal products commodities is conducted according to the risk assessment steps of Article 2.1.4. of Terrestrial Code. If at least one assessment among the entry assessment, the exposure assessment and the consequent assessment demonstrates no significant risk, the commodities are also identified as safe commodities. using the criteria relating to processing or treatment can only be undertaken when processing or treatments are well defined. It may not be necessary to take into account the entire process or treatment, so long as the steps critical for the inactivation of the pathogen of concern are considered.

The commodities which require any risk management to reduce the level of risk, cannot be included in the list of safe commodities. Such managements should be provided in Terrestrial Code.

It is assumed that processing or treatment (i) uses standardised protocols, which include the steps considered critical in the inactivation of the pathogen of concern; (ii) is conducted according to Good Manufacturing Practices; and (iii) that any other steps in the treatment, processing and subsequent handling of the animal product do not jeopardise its safety.

(Rationale)

The comments are submitted as references for the future improvement of the proposed text.

Article X.X.2.

Criteria

For an animal product commodity to be considered included in the list of a safe commodity safe commodities of each disease-specific chapter for international trade, it should comply with the following criteria:

1) The commodity is apparently distinguishable from other commodities;

2) The risk of commodity can be assessed taking into account scientific evidence, relevant process and production methods, relevant inspection, sampling and testing methods, prevalence of relevant disease, relevant ecological and environmental conditions and quarantine or other treatment; In case where relevant scientific evidence is insufficient, the listing of the commodity is pending;

3) There is strong evidence that the pathogen hazard is not present in the tissues from which the animal product is derived commodity at a concentration able to cause infection adverse health effect on animals or humans in importing countries in a human or animal by a natural exposure route through international trade either:

a) without any process or treatment The evidence is based on the known distribution of the pathogen in an infected animal, whether or not it shows clinical signs of disease:

OR

b) If the pathogen may be present in, or may contaminate, the tissues from which the animal product is derived, with the physical, chemical or biological processing or treatment which is normally applied to produce the commodity animal product to be traded, while not being specially directed at this pathogen, inactivates the pathogen to the extent that possible infection of a human or animal is prevented through its action which is;

a) physical (e.g. temperature, drying, irradiation);

or

b) chemical (e.g. iodine, pH, salt, smoke);

or

c) biological (e.g. fermentation);

or

d) a combination of a) to c) above.

4) The necessary precautions can be taken to avoid contamination of the commodity with the hazard.

(Rationale)

The comments are submitted as references for the future improvement of the proposed text.

13. Chapter 14.7 Infection with Peste des Petitis Ruminants Virus

Article 14.7.21.

Recommendations for importation from PPR free countries or zones

For products of sheep and goats, other than milk, fresh meat and their products

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that the products are derived from animals ~~these animals~~:

- 1) which have been kept in a PPR free country or zone since birth or for the past 21 days;
- 2) which have been slaughtered in an approved slaughterhouse/abattoir and have been subjected to ante- and post-mortem inspections with favourable results.

(Rationale)

The original text is meaningless.