

Japan's Comments on Articles 8.8.4. and 8.8.4bis. in The Code Commission Report of the February 2016 meeting

Japan would like to express its appreciation to the Terrestrial Animal Health Standards Commission (TAHSC) for this opportunity to comment on the proposed revisions of the *Terrestrial Animal Health Code*. At the same time, Japan would like to ask the TAHSC to avoid hereafter such an irregular procedure for asking comments as it complicates the coordination process with national stakeholders.

Japan opposes the proposed revision, which provides for the establishment of a compartment free from FMD where vaccination is practiced, for the following reasons :

We understand that the concept of compartment is to allow the international trade separately from the sanitary conditions or disease status of the country, on the premise that strict biosecurity measures are implemented in order to prevent exposure to pathogens.

Therefore, a contradiction arises if FMD vaccination is carried out to animals in a compartment, which is one of the control measures expecting exposure to FMD virus. In other words, compartmentalisation and vaccination are two different concepts contradictory to each other.

In this regard, there is a clear explanation in the guidelines* on the OIE website as follows:

"The objective is to establish a subpopulation that is free not only from disease but also from infection, so animals in a compartment should not be vaccinated for the specified diseases."

*FACILITATING SAFE TRADE: HOW TO USE THE TERRESTRIAL CODE TO SET
HEALTH MEASURES FOR TRADE IN TERRESTRIAL ANIMALS AND PRODUCTS
(6.3. The use of compartmentalisation.)
(http://www.oie.int/fileadmin/Home/eng/International_Standard_Setting/docs/pdf/A_IMPORT_HEALTH_MEASURES_1.pdf)