Japan's comments on the report of the Code Commission in October, 2006

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CHAPTER 1.3.5

Comments on the proposed amendment on the Zoning and compartmentalization Chapter of the OIE Terrestrial Animal Health Code ("the Code")

We submit the following comments on this chapter in line with communication with experts and stakeholders.

1. General comments

1) We appreciate the efforts made by the Secretariat and the Code commission for preparing the proposed amendments on this Chapter to give certain clarification on the application of compartmentalization.
2) We think "biosecurity plan" is the key concept for application of zoning and compartmentalization, while it is new to Member Countries. Recognizing OIE's new 2-year consultation mechanisms to allow sufficient consideration on proposed amendment of the code, we, being ready to give full consideration on the definition of "biosecurity plan" and article 1.3.5.4.5, would like to propose to adopt them as "under study", rather than full immediate adoption at the forthcoming International Committee meeting.
3) Sufficiently detailed guidelines defining specific requirements according to the diseases should be developed to apply compartmentalization. Such guidelines are important elements that they should be included in the code through intensive discussion by relevant disease experts, the Scientific and Code Commission, and Member countries. As a reference, we would like to point out that general and disease specific guidelines are also included in the code for animal disease surveillance, which is very critical to determine animal health status.
4) We support the amendment made on a part of article 1.3.5.1. describing that zoning and compartmentalization cannot be applied to all diseases. We think it difficult to apply compartmentalization to highly contagious diseases and/or diseases transmitted by vector. To avoid misunderstanding among Member Countries, the OIE should provide basic idea to decide if compartmentalization is applicable to certain disease or not. If the OIE decided to discuss the matter in ad hoc group or the Scientific Commission, Japanese expert(s) could contribute such activities.
5) Lastly, we would like to remind that we are confused observing possible different approaches on this chapter between September report of the Scientific Commission and October report of the Code commission. The Scientific Commission reported that the current Chapter should remain unchanged and that guidelines should be developed on the practical implementation of the chapter as an appendix to the code in its September meeting report. On the other hands, the Code Commission proposed revision of the Chapter and show its intention to develop the guidelines of the compartmentalization concept to avian influenza in its October report without mentioning what is resolved in the Scientific Commission. We expect that both commissions have a uniform approach on the issue.

2. Specific comments

1) Definition of biosecurity plan

(Proposed texts)

Biosecurity plan

means a plan that identifies potential pathways for the introduction and spread of *disease* in a *zone* or *compartment*, and describes the measures which are being or will be applied to mitigate the *disease* risks, if appropriate, in accordance~~, when applicable ,~~ with the recommendations in the *Terrestrial Code*. The plan also describes how these measures are audited to ensure that the risks are regularly re-assessed and the measures adjusted accordingly.

(Rationale)

Biosecurity plan is prepared to prove the ability to maintain the animal health status in zone or compartment, and it is the basic right of importing country under the SPS agreement to ask exporting country to make it according to importing country's ALOP, if necessary.

2) Status of guideline

(Proposed texts)

Article 1.3.5.1.

Introduction

……

Zoning and compartmentalisation cannot be applied to all *diseases* ~~but~~ and specific guidelines stipulating separate requirements will be developed in the code for each *disease* for which the application of zoning or compartmentalisation is considered appropriate. …….(1)

To regain free status following a *disease outbreak* in a *zone* or *compartment*, *biosecurity plan* should be modified properly to avoid re-occurrence of a disease and Member Countries should follow the recommendations in the relevant *disease* chapter and guidelines for compartmentalization in the *Terrestrial Code*. ….(2)

(Rationale)

(1)Considering their importance, specific requirements to apply compartmentalization to each disease should be in the appendix of the code so that Member Countries should be actively involved in their developing process.

(2) To regain free status it should be required to examine and correct biosecurity plan according to the findings of investigation for the cause of occurrence.

3) organizing the explanation of biosecurity plan

(Proposed texts)

Article 1.3.5.4.

Principles for defining a zone or compartment

……

5. For a *compartment*, the *biosecurity plan* should describe the partnership between the relevant enterprise/industry and the *Veterinary Administration*, and their respective responsibilities. It should also describe the routine operating procedures to provide clear evidence that the surveillance conducted, the live animal identification and traceability system, and the management practices are adequate to meet the definition of the *compartment*. In addition to information on animal movement controls, the plan should include herd or flock production records, feed sources, surveillance results, birth and death records, visitor logbook, morbidity and mortality history, medications, vaccinations, documentation of training and any other criteria necessary for evaluation of risk mitigation. The information required may vary according to the species and *disease(s)* under consideration. ~~The *biosecurity plan* should also describe how the measures will be audited to ensure that the risks are regularly re-assessed and the measures adjusted accordingly.~~

(Rationale)

The sentence is duplicated in the definition of biosecurity plan.

4) examination and/or investigation of compartment by importing country
(Proposed texts)

Article 1.3.5.5.

Sequence of steps to be taken in ~~defining~~ establishing a zone / compartment and having it recognised for international trade purposes

……

1. For zoning

a) The *exporting country* identifies a geographical area within its territory, which it considers to contain an animal *subpopulation* with a distinct *health status* with respect to a specific *disease* / specific *diseases*, based on surveillance ~~and monitoring~~ and *monitoring*. ….(1)

……

c) The *exporting country* provides: ~~the above information above to the *importing country*, and explains that with an explanation of why the area can be treated as an epidemiologically separated zone for *international trade* purposes.~~

i) the above information ~~above~~ to the *importing country*, ~~and explains that~~ with an explanation of why the area can be treated as an epidemiologically separate~~d~~ zone for *international trade* purposes; and
ii)access to enable setting of zoning to be examined and evaluated upon request of the importing country. …..(2)

……

2. For compartmentalisation

……

d) The exporting country provides: ~~the above information above to the *importing country*, and explains that with an explanation of why such an enterprise can be treated as an epidemiologically separated *compartment* for international trade purposes.~~

i) the above information ~~above~~ to the *importing country*, ~~and explains that~~ with an explanation of why the area can be treated as an epidemiologically separate~~d~~ zone for *international trade* purposes; and
ii)access to enable setting of compartment to be examined and evaluated upon request of the importing country. ….(2)

(Rationale)
(1) According to the code commission report, definition of a term “monitoring” is in the examination process and should be retained until the review is concluded.
(2)According to article 6, paragraph 3 of the SPS agreement, if it deemed necessary for importing country, to examine and/or investigate whether the setting of compartment is appropriate for proper recognition of proposed zoning/compartment’s animal health status, reasonable access should be given by exporting country upon request. Similar description exists in the article 1.3.6.4.11.

CHAPTER 2.2.10

Comments on the proposed amendment on the Foot and mouth disease (FMD) Chapter of the Code

1. General comments

We appreciate the efforts made by the Secretariat, the Scientific Commission and the Code Commission to propose a new concept, "containment zone" to be applied in the event of limited outbreak in a previously FMD free country or zone in article 2.2.10.6 (bis) (under study).

However, to decide whether the outbreak is limited, which is one of the fundamental requirements of "containment zone", it is essential that no subsequent outbreak is observed within the containment zone and disease free status was kept in the rest of the country or zone for a certain periods of time. To ensure such condition, the requirement stipulated in article 2.2.10.7 (recovery of free status) of the code is essential in the end. Japanese experts are of the opinion that it takes at least 3 months after the last case with stamping-out policy to fill requirement of proposed "containment zone". From the view of improvement in global animal health, the highest priority should be given to achieve prompt eradication of FMD. For this purpose, taking into consideration the human and financial resources necessary for the setting up "containment zone", it is reasonable to allocate the all available resources to eradicate the disease.

We are of the opinion that issues related to the new concept, including mentioned below, should be further discussed among experts including Ad hoc Group for Evaluation of Country Status for FMD Disease from the view of practical application, and at least, "under study" status should be kept for a while.

1) requirements of the physical area of containment zone (geographical criteria),
2) requirements of additional measure to ensure containment, such as setting up buffer zone,
3) surveillance criteria which is appropriate to confirm no undetected case within the "containment zone" and no evidence of infection within the rest of the country or zone, and
4) additional requirements in case of vaccination.

2. Specific comments

1) Separation of free countries from infected country or zone

We support the proposal in article 2.2.10.2 and 2.2.10.3 that free country should be separated from neighbouring infected countries by a buffer zone, or physical or geographical barriers, and animal health measures that effectively prevent the entry of virus should be implemented.

2) requirement for international trade of skins and trophies derived from FMD susceptible wild animal

(Proposed texts)

Article 2.2.10.29.

When importing from FMD free countries or zones (where vaccination either is or is not practised), *Veterinary Administrations* should require:

for skins and trophies derived from FMD susceptible wild animals

the presentation of an *international veterinary certificate* attesting that these products are derived from animals that have been ~~killed~~ kept ~~kept~~ in such a country or zone ~~since birth~~ since birth, or which have been imported from a country or zone free of FMD (where vaccination either is or is not practised).

(rationale)

The original text should be kept, since the risk of introducing FMD does still exist if the animal may have entered from infected country or zone.

CHAPTER 2.3.13

Comments on the proposed amendment on the Bovine Spogiform Encephalopathy (BSE) Chapter of the code

We submit the following comments on this chapter in line with communication with prion disease experts and stakeholders.

1. addition of requirement for international trade from the country with negligible or controlled risk(article 2.3.13.6a, 2.3.13.7, and 2.3.13.12)

We greatly welcome the proposed addition of requirements on international trade in cattle selected for export and *meat-and-bone meal* and *greaves*, corresponding to non-negligible risk subpopulation within countries recognized as negligible risk. We, however, would like to propose similar requirements on fresh meat and meat products from cattle, limiting to those derived from cattle born after the date from which the ban on the feeding is effectively enforced.

We support the proposal made on article 2.3.13.7 to strengthen conditions on cattle for export from countries recognized as controlled risk.

2. proposal for enhanced feed ban and clarification on its effective enforcement

Current code stipulates a ruminants to ruminants feed ban as a requirement to control BSE risk. However, many countries have found BSE case on cattle born after feed ban was enforced and practically, avoiding cross contamination is critical to eradicate BSE agent. Based on this, we consider that we should enhance feed ban to prohibit feeding ruminants with *meat-and-bone meal* and greaves derived from mammals for securing its effectiveness.

No concrete criteria to determine when feed ban is effectively enforced until now, and Member Countries might be confused in practical implementation of this article. Therefore, we request OIE to develop criteria to determine when feed ban is effectively enforced. Along with such discussion, we think OIE should consider prohibiting SRM in animal feed in addition to strengthened feed ban, since such a measure would greatly contribute effectiveness of feed ban.

3. Gelatin and collagen prepared from bones and intended for food or feed, cosmetics, pharmaceuticals including biologicals, and medical devices

We are of the opinion that the relaxation of requirements for cattle bones used as ingredients of gelatin and collagen should be discussed deliberately based on scientific knowledge.

In addition, Japan would like to request that the OIE publish the discussion reports and the data used from the viewpoint of transparency.

(Proposed texts)

Article 2.3.13.3.

Negligible BSE risk

.....

3. EITHER:

a) there has been no *case* of BSE or, if there has been a *case*, every *case* of BSE has been demonstrated to have been imported and has been completely destroyed, and

.....

ii) it has been demonstrated through an appropriate level of control and audit that for at least 8 years neither *meat-and-bone meal* nor *greaves* derived from ~~ruminants~~ mammals has been fed to ruminants;

OR

b) if there has been an indigenous *case*, every indigenous *case* was born more than 11 years ago; and

……

ii) it has been demonstrated through an appropriate level of control and audit that for at least 8 years neither *meat-and-bone meal* nor *greaves* derived from ~~ruminants~~ mammals has been fed to ruminants; and

Article 2.3.13.4.

Controlled BSE risk

……

3. EITHER:

a) there has been no *case* of BSE or, if there has been a *case*, every *case* of BSE has been demonstrated to have been imported and has been completely destroyed, the criteria in points 2 to 4 of Article 2.3.13.2. are complied with, and it can be demonstrated through an appropriate level of control and audit that neither *meat-and-bone meal nor greaves* derived from ~~ruminants~~ mammals has been fed to ruminants, but at least one of the following two conditions applies:

……

ii) it cannot be demonstrated that controls over the feeding of *meat-and-bone meal* or *greaves* derived from ~~ruminants~~ mammals to ruminants have been in place for 8 years;

OR

b) there has been an indigenous *case* of BSE, the criteria in points 2 to 4 of Article 2.3.13.2. are complied with, and it can be demonstrated through an appropriate level of control and audit that neither *meat-and-bone meal* nor greaves derived from ~~ruminants~~ mammals has been fed to ruminants, but at least one of the following two conditions applies:

……

ii) it cannot be demonstrated that controls over the feeding of *meat-and-bone meal* and greaves derived from ~~ruminants~~ mammals to ruminants have been in place for 8 years;

Article 2.3.13.6.a

……

b) were born after the date from which the ban on the feeding of ruminants with *meat-and-bone meal* and *greaves* derived from ~~ruminants~~ mammals had been effectively enforced.

Article 2.3.13.7.

……

3. ~~in the case of a country, *zone* or *compartment* where there has been an indigenous *case*,~~ cattle selected for export were born after the date from which the ban on the feeding of ruminants with *meat-and-bone meal and greaves* derived from ~~ruminants~~ mammals was effectively enforced.

Article 2.3.13.8.

.....

1. the feeding of ruminants with *meat-and-bone meal* and *greaves* derived from ~~ruminants~~ mammals has been banned and the ban has been effectively enforced;

.....

3. cattle selected for export:

   a) are identified by a permanent identification system enabling them to be traced back to the dam and herd of origin and are not the progeny of BSE suspect or confirmed females;

   b) were born at least 2 years after the date from which the ban on the feeding of ruminants with *meat-and-bone meal* and *greaves* derived from ~~ruminants~~ mammals was effectively enforced.

Article 2.3.13.9.

.....

2. the cattle from which the *fresh meat* and *meat products* were derived passed ante-mortem and post-mortem inspections, and were born after the date from which the ban on the feeding of ruminants with *meat-and-bone meal and greaves* derived from mammals was effectively enforced.

Article 2.3.13.12.

1. Ruminant-derived *meat-and-bone meal* or *greaves*, or any *commodities* containing such products, which originate from a country, *zone* or *compartment* defined in Article 2.3.13.3. should not be traded if such products were derived from cattle born before the date from which the ban on the feeding of ruminants with *meat-and-bone meal* and *greaves* derived from ~~ruminants~~ mammals had been effectively enforced.

CHAPTER 2.5.7

Comments on the proposed amendment on the Equine rhinopneumonitis Chapter of the Code

Title of the code

(Current title)
EQUINE RHINOPNEUMONITIS (Equine herpesvirus infection)

(Proposed title)
EQUINE HERPESVIRUS TYPE 1 INFECTION (Abortigenic and paralytic forms)
OR at least
EQUINE HERPESVIRUS TYPE 1 INFECTION.

(Rationale)
Equine rhinopneumonitis is the generic name of Equine herpesvirus types 1 (EHV-1) and 4 (EHV4) infection. These viruses are ubiquitous among horse populations in the world, and causes respiratory infections which is not serious for international trade. However, infection to abortigenic and paralytic forms of EHV-1 also causes serious economic impact and fetal infection, which is critical. Therefore, the code should focus on the infection to abortigenic and paralytic forms of EHV-1, and the disease name should be changed to EHV-1 abortigenic and paralytic infection or at least to EHV-1 infection instead of equine rhinopneumonitis in the OIE code.

According to the proposed change, the wording “equine rhinopneumonitis” in the code as well as Terrestrial Manual should also be changed accordingly.

CHAPTER 2.6.7

Comments on the proposed amendment on the Classical Swine Fever Chapter of the Code

We would like to make two comments on the proposed amendments as follows.

1) Definition of CSF status (Article 2.6.7.3 and 2.6.7.4)

We appreciate the efforts made by the Code commission for preparing this proposal. We think that the proposed amendments on the Article 2.6.7.3, 2.6.7.4, 2.6.7.5 is still complicated. Especially:

1. "Historically free status" stipulated in 2.6.7.3.1 is defined in 3.8.1.6, which could also be applied to other diseases and adds complication.
2. relationship between "Free status as a result of an eradication program" stipulated in 2.6.7.3.3 and "Recovery of free status" in Article 2.6.7.5 is not clear.
3. relationship between free status and vaccination is not clear.

Referencing definition of country status of foot and mouth disease which is widely accepted among member countries, we would like to propose new definition of free status for better understanding and avoiding misunderstanding among member countries as follows.

In addition, we would like to ask the code commission to give clarification on what is "validated means of distinguishing between vaccinated and infected pigs" in article 2.6.7.5.

(Proposed texts)

Article 2.6.7.3.

CSF free country, zone or compartment

To be considered as CSF free country, *zone* or *compartment* where vaccination is not practiced, a country, *zone* or *compartment* should achieve the following criteria:

1. *surveillance* in accordance with Appendix 3.8.8. has been in place for at least 12 months,
2. *risk assessment* as referred to in Article 2.6.7.2. has been conducted,
3. no *outbreak* of CSF has been observed for at least 12 months,
4. vaccination has been banned in all domestic pigs for at least 12 months,
5. no importation of any domestic pigs vaccinated against CSF since the cessation of vaccination
6. based on *surveillance* in accordance with Appendix 3.8.8., CSF infection is not known to occur in any wild pig population for at least 12 month.

Article 2.6.7.4.

Recovery of free status

(same as current text)

2) Reference to Codex Alimentarius Code of Hygienic Practice for Meat

(Proposed texts)

Article 2.6.7.18

When importing from countries or zones free of CSF in domestic pigs but with infection in the wild pig population, *Veterinary Administrations* should require:

for fresh meat of domestic pigs

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

1. were kept in a country, zone or compartment free of CSF in domestic pigs since birth or for at least the past 3 months;

2. have been slaughtered in an *approved abattoir*, have been subjected to ante-mortem and post-mortem inspections as described in ~~the Codex Alimentarius Code of Hygienic Practice for Meat~~ Appendix 3.10.1, and have been found free of any sign suggestive of CSF.

Article 2.6.7.19

When importing from countries or zones free of CSF, *Veterinary Administrations* should require:

for *fresh meat* of wild pigs

the presentation of an *international veterinary certificate* attesting that:

1. the entire consignment of meat comes from animals which:

   a) have been killed in a country or zone free of CSF;

   b) have been subjected to a post-mortem inspection as described in ~~the Codex Alimentarius Code of Hygienic Practice for Meat~~ Appendix 3.10.1, in an approved examination centre, and have been found free of any sign suggestive of CSF;

and, if the *zone* where the animal has been killed is adjacent to a *zone* with infection in wild pigs:

2. a sample has been collected from every animal shot, and has been subjected to a virological test and a serological test for CSF, with negative results.

(Rationale)
These two articles are referencing Codex Alimentarius Code of Hygienic Practice for Meat(CHPM), but not all chapter has similar reference. CHPM is primarily the code for food safety, not for animal health. Taking into account that CSF does not cause any food safety concerns, reference to Appendix 3.10.1 which stipulates requirements for ante- and post-mortem inspections is more suitable.

CHAPTER 2.7.12

Comments on the proposed amendment on the Avian Influenza Chapter of the Code

We would like to make two comments on the proposed amendments as follows.

Article 2.7.12.1.

1) Reporting of infection in wild birds

(Proposed texts)

4. For the purposes of *international trade*, a country should interpret an occurrence of infection with HPNAI virus in birds other than poultry according to the *Terrestrial Code* and should not impose immediate trade bans. However, in case that contact of infected birds with poultry is suspected, infection should be reported to OIE.

(Rationale)
It's quite difficult to control outbreak of HPNAI in wild birds and we agree not to impose immediate trade bans. However, domestic water birds may have contact with migratory birds. In case that contact of infected birds with poultry is suspected, we think the infection should be reported.

2) Detection of antibody as a infection

(Proposed texts)

~~5. Antibodies to H5 or H7 subtype of NAI virus, which have been detected in poultry and are not a consequence of vaccination, have to be further investigated. In the case of isolated serological positive results, NAI infection may be ruled out on the basis of a thorough epidemiological investigation that does not demonstrate further evidence of NAI infection.~~

~~4.~~6.~~.~~5. The following defines the occurrence of infection with NAI virus:

a) HPNAI virus has been isolated and identified as such or viral RNA specific for HPNAI has been detected in poultry or a product derived from poultry; or

b) LPNAI virus has been isolated and identified as such or viral RNA specific for LPNAI has been detected in poultry or a product derived from poultry~~; or~~;or

~~c) antibodies to H5 or H7 subtype of NAI virus that are not a consequence of vaccination have been detected in poultry. In the case of isolated serological positive results, NAI infection may be ruled out on the basis of a thorough epidemiological investigation that does not demonstrate further evidence of NAI infection.~~

c) antibodies to H5 or H7 subtype of NAI virus that are not a consequence of vaccination have been detected in poultry. In the case of isolated serological positive results, NAI infection may be ruled out on the basis of a thorough epidemiological investigation that does not demonstrate further evidence of NAI infection.

(Rationale)
Detection of antibody is a conventional method to examine the existence of Avian Influenza virus (AIV) widely used among member countries. Although it is not clear if AIV is still in the particular

host, existence of antibody should be considered existence of AIV in the flock. By excluding detection of antibody from definition of infection, some member countries may loses incentives for further examination of AIV and thus results in not reporting of AI infection.

Therefore, we would like to stress that detection of antibody should be treated as infection to control AI worldwide, and the original provision should be retained.

CHAPTER 3.5.1

Comments on the proposed amendment on the General principle for animal identification and traceability Chapter of the Code

Article 3.5.1.1.

(Proposed texts)

6. Animal identification and animal traceability should be under the responsibility of the Veterinary Administration, notwithstanding the responsibilities of other Competent Authorities having jurisdiction throughout the food chain. The performance such as proper application of animal identification and prompt reporting should be monitored through inspection, and any improper finding should be corrected to keep integrity of the system.

(Rationale)

Monitoring and inspection of animal traceability system is required to keep integrity of the system and this should be stipulated in general principles.

CHAPTER 1.3.3

Comments on the Evaluation of Veterinary Service Chapter of the Code and *Performance, Vision and Strategy Instrument*

We appreciate efforts made by OIE to revise the PVS instrument, the Handbook and the Indicators to reflect new inputs from the pilot exercise. We recognized (as reported in the OIE news in the Bulletin No. 2006-3,) that these updates will be adopted without member countries' approval to enable flexible and timely revision on these tools. In light of distinction in procedure for revision from the Code, we would like to ask clarification on their status under the SPS Agreement, that is, whether these tools are deemed as international standards.

Recognizing that the PVS evaluation is in the developing stage and will be used by countries as the basis for strategy to improve domestic veterinary service, we believe that the Commission should also start to review issues regarding implementation of PVS evaluation. After sufficient data are accumulated, Japan would like to ask the Commission to assess the deviation range of evaluation results among evaluators and geographical representation of evaluators in its trial stage.

SECTION 3.2

Comments on the Collection and processing of semen Section of the Code

As far as we have examined, there is no scientific evidence showing vesicular stomatitis virus (VSV) is transferable through semen, while article 3.2.2.3, 3. d)shows the test requirement for the disease as follows.

> Article 3.2.2.3.
> **Testing programme for boars**
> 3.Routine tests
> d)Vesicular stomatitis
> Boars to give negative results to a complement fixation test in accordance with the Terrestrial Manual. Routine tests to be applied at least every 12 months.

Bovine animals are also infected with VSV, however, appendix 3.2.1 (bovine and small ruminant semen) doesn't have any similar requirement. Chapter 2.2.11 doesn't have any similar requirement either. We propose that OIE should show the evidence to require VSV test for semen, or the article 3.2.2.3, 3 d) should be deleted.

APPENDIX 3.8.4

Comments on Surveillance for bovine spongiform encephalopathy of the code

We would like to iterate our previous comments made last February on BSE surveillance, since this seems not to be resolved.

Article 3.8.4.4

- Firstly, we would like to remind the Secretariat that no record of discussion has been made to change the maximum possible prevalence from 1/1,000,000 to 1/100,000 in the last General Session and the subsequent ad hoc groups. In this regard, this issue should be further reviewed at the earliest opportunities.

Secondly, we appreciate the proposed option to combine the two sub-populations, "casualty or emergency slaughter or downer cattle" and "fallen stock," depending on each county's condition and decision. However, we still have an opinion that the current value point system which is too much focused on passive surveillance (clinical suspect) should be reviewed in line with accumulation of knowledge including global statistical information and progress in diagnostic techniques. If time is not yet ripe for the review, we would like to propose to combine the three sub-populations excluding "routine slaughter" as a second-best solution.

…….

Fourthly, we believe that the following information should be provided to member countries in order to ensure further transparency.

a) The OIE's evaluation on the peer review conducted by two OIE Collaborating centres on the BSurveE model
b) The planed schedule of BSE Ad Hoc Group on BSE surveillance

(Rationale)

We know that focusing on clinical suspect was the most efficient and effective strategy to detect BSE infected cattle in BSE endemic phase of Europe. However, it does not necessarily mean that passive surveillance is the best way to determine the prevalence and monitor its trend. In other words, we do not see that passive surveillance is the one-size-fits-all strategy applicable everywhere. For example, Table 1 shows "Passive surveillance ratio" of EU member states and Japan. It clearly proves that "Passive surveillance is more effective than active surveillance only in high "Annual incidence rare" counties. On the contrary, "Passive surveillance" does not effectively work in relatively low "Annual incidence rate" countries including Japan. We don't believe that this phenomenon is caused by insufficient owner/veterinarian awareness program because these low "Annual incidence rate" countries have very good infrastructure of Veterinary Services, and not only EU member states but also Japan have been enhanced owner/veterinarian awareness program including BSE clinical signs. Furthermore, Table 2 shows that "Passive surveillance ratio" decreases as "Annual incidence rate" decreases. It suggests that Passive surveillance could not find any positive cases where countries with "Annual incidence rate" less than ten.

Table 1: Positives in active monitoring and passive surveillance

	Annual Incidence Rate 1)	Active monitoring ratio 2)	Passive surveillance ratio 2)
Portugal	94.901	0.0679%	15.2941%
United Kingdom	68.799	0.0422%	26.7857%
Ireland	43.327	0.0128%	11.2727%
Spain	38.945	0.0194%	34.6667%
Slovakia	24.635	0.0084%	0.0000%
Germany	10.915	0.0025%	0.1511%
Czech Rep.	10.324	0.0035%	
Slovenia	9.170	0.0044%	0.0000%
Belgium	7.882	0.0020%	1.7751%
France	4.736	0.0016%	8.3333%
Poland	3.578	0.0023%	0.0000%
Netherlands	3.399	0.0011%	0.0000%
Japan 3)	2.491	0.0004%	
Italy	2.348	0.0008%	0.0000%
Denmark	1.296	0.0004%	0.0000%
Austria	0.000	0.0000%	0.0000%
Luxembourg	0.000	0.0000%	0.0000%
Greece	0.000		
Finland	...		

Source: 1) OIE (2004)
2) European Commission (2004)
3) MAFF and MHLW (FY2004)

Table 2: Trend of Annual incidence rate and passive surveillance ratio

	2001		2002		2003		2004	
	Annual incidence rate 1)	Passive surveillance ratio 2)	Annual incidence rate 1)	Passive surveillance ratio 2)	Annual incidence rate 1)	Passive surveillance ratio 2)	Annual incidence rate 1)	Passive surveillance ratio 2)
Austria	0.96	0.0000%	0.00	0.0000%	0.00	0.0000%	0.00	0.0000%
Belgium	28.22	3.7190%	25.75	1.7921%	10.54	0.0000%	7.88	1.7751%
Cyprus	0.00	0.0000%	0.00	0.0000%	0.00	0.0000%	0.00	0.0000%
Czech Rep.	2.85		2.50		5.78	0.0000%	10.32	
Denmark	6.77	1.3699%	3.35	0.0000%	2.39	2.6316%	1.30	0.0000%
Finland	2.39	0.0000%	0.00	0.0000%	0.00	0.0000%	0.00	0.0000%
France	19.70	19.4030%	20.96	19.8068%	12.01	2.7149%	4.74	8.3333%
Germany	19.97	3.2710%	17.02	3.1792%	8.71	1.1710%	10.92	0.1511%
Greece	3.30	0.0000%	0.00		0.00	0.0000%	0.00	0.0000%
Ireland	61.80	25.5187%	88.39	21.1350%	57.81	12.4242%	43.33	11.2727%
Italy	14.10	0.0000%	10.60	0.0000%	9.86	1.5873%	2.35	0.0000%
Luxembourg	0.00	0.0000%	14.54	0.0000%	0.00	0.0000%	0.00	0.0000%
Netherlands	10.25	3.0928%	13.19	2.5641%	10.86	8.0000%	3.40	0.0000%
Poland	0.00		1.28		1.49	1.9608%	3.58	0.0000%
Portugal	137.88	19.0184%	107.80	0.1533%	137.19	27.4510%	94.90	15.2941%
Slovakia	18.34		18.73		6.74	0.0000%	24.64	0.0000%
Slovenia	4.34		4.44		4.39	0.0000%	9.17	0.0000%
Spain	24.23	9.3750%	37.95	25.3731%	46.31	34.2466%	38.95	34.6667%
United Kingdom	232.76	65.8960%	228.24	54.4725%	122.25	40.7895%	68.80	26.7857%
Japan	1.44		0.97		1.96		2.49	

Source: 1) OIE
2) European Commission

Comments on the Future Work Programme for the Terrestrial Animal Health Standards Commission

Consolidation of Terrestrial and Aquatic Codes

We support the challenge of OIE to reform the Terrestrial and Aquatic Codes by consolidating their general provisions. We believe the common concepts will be better harmonized through this work. However, in the course of consolidation work, we would like to request the Code commission to give proper consideration on difference in epidemiology or biology between both areas. Chapters developed through discussions in light of application to specific diseases, e.g. “Zoning and Compartmentalization”, should not be editorially changed without technical consideration.

Topics assigned to Animal Production Food Safety Working Group

We welcome OIE’s recent collaborative works with Codex through APFSWG. These efforts will greatly facilitate harmonization in international standards on common issues between animal health and food safety. However, we concerns the workload on APFSWG because in contrast to the Scientific Commission, which refers many of assigned topics to ad hoc groups, APFSWG is assigned too much work compared to its limited resource. To lighten the burden on APFSWG, we suggest to reconsider priority of the work on “Good Farming Practices”, in which no recognizable progress has made since last March, until other preceding topics are finished.