

## Japan's Comments on the Terrestrial Animal Health Standards Commission Report of the February 2022 meeting

Japan would like to express its appreciation to the Terrestrial Animal Health Standards Commission (TAHSC) and other relevant Commissions, Working Groups and *ad hoc* Groups for all the work they have done. Japan also thanks the TAHSC for providing us with the opportunity to comment on the proposed revisions to the texts of the Terrestrial Animal Health Code.

Please find our comments on the following texts:

### Contents

1. GLOSSARY DEFINITION FOR "POULTRY"	• • • • • 2
2. CHAPTER 7.5. ANIMAL WELFARE DURING SLAUGHTER	• • • • • 3
3. CHAPTERS on BOVINE SPONGIFORM ENCEPHALOPATHY (BSE)	• • • • • 4

## 1. GLOSSARY DEFINITION FOR “POULTRY”

### Comment

Japan does not support the proposed amendment to the glossary definition for “poultry”, which allows for wider coverage of birds that are not considered poultry.

First, Japan would like to draw the attention of the Code Commission and Member Countries to the fact that a HPAI outbreak confirmed in a trader holding of pet birds in a Member Country in September 2020 had spread not only domestically but also to a neighbouring country, and that another HPAI event which was confirmed in the pet shop section of a garden centre in an island of a Member Country in November 2020 and then spread locally in the island and jumped to the mainland. These two episodes clearly demonstrate that businesses that keep pet birds for breeding or selling have a higher risk of virus transmission, which encompasses both animal and public health concerns.

Japan believes that, depending on the level of biosecurity and specific epidemiological situations, the virus from this type of operation could enter into population of “poultry” as currently defined in the Terrestrial Code. Furthermore, the risk of human infections from pet birds is significant in the context of One Health, thus should be appropriately addressed by implementing effective disease prevention and control measures.

Second, it makes logical sense to assume that pet birds that are kept in a commercial operation for breeding or selling such as pet shop or garden centre have two different sequels in terms of those birds would become poultry or not. One scenario is that pet birds are sold to a single household where the products of the birds are used within the same household exclusively, hence the birds are not considered poultry as per the current definition. Another is that the birds are sold to households that are deemed to have direct or indirect contact with poultry or poultry facilities, hence the birds are considered poultry. It is evident that a commercial operation of pet birds upstream in the supply chain can be a source of HPAI in poultry in households downstream and this risk can be reduced by including such bird population in “poultry” and applying stricter disease prevention and control measures.

In conclusion, Japan has a grave concern over potential increase in HPAI risk in both animals and humans arising from the current proposal, thus does not support the proposed amendment. Japan instead requests to keep the text as currently written and asks for a clear explanation and detailed rationale from the Code Commission as to why pet birds kept at commercial premises for breeding or selling should be considered non-poultry just like pet birds kept in individual households.

## 2. CHAPTER 7.5. ANIMAL WELFARE DURING SLAUGHTER

### 1) Proposal of amendment to Article 7.5.20 (insertion / deletion)

#### Article 7.5.20

#### **Methods, procedures or practices unacceptable on animal welfare grounds for free-moving animals**

- 1) ~~None of the~~ The following practices for handling animals are unacceptable and should not be used except when required to ensure safety of animals, animal handlers, and other personnel involved in the slaughter process:
  - a) crushing or breaking tails of animals;
  - b) applying pressure using an injurious object or applying an irritant substance ~~to sensitive areas such as eyes, mouth, ears, anogenital region or belly~~;
  - c) hitting animals with instruments such as large sticks, sticks with sharp ends, ~~metal~~ piping, stones, fencing wire or leather belts;
  - d) kicking, throwing or dropping animals;
  - e) grasping, lifting or dragging animals only by some body parts such as their tail, head, horns, ears, limbs, wool or hair;
  - ~~f) dragging animals by any body part, by any means, including chains, ropes or by hand;~~
  - ~~g) f) forcing animals to walk over other animals;~~
  - ~~h) g) interfering with any sensitive area (e.g. eyes, mouth, ears, anogenital region or belly).~~

#### **Rationale**

Basically, Japan agrees that prohibiting the listed procedures or practices is important to secure good animal welfare condition. However, banning the practices regardless of circumstances might lead to unsafe situations for animals and humans, and thus, compromise the animal welfare. In the light of ensuring safety of animals and workers, the handling practices listed in this article should not be banned in case of absolute need. Such situations can arise in the following cases:

- to isolate animals that can move freely but are injured, sick, very young or pregnant to protect them from other animals and be slaughtered with priority (Article 7.5.14)
- to prevent animals from walking over other animals (Article 7.5.20)

Therefore, Japan would like to propose the insertion of the exception provision to address such situations.

In addition, Japan requests the Code Commission to reconsider the inclusion of point f). Practices described in point f) may be necessary for the safety of slaughterhouse operations. In such cases, using ropes or other devices to keep appropriate distance between a worker and an animal, rather than directly grabbing the animal by hand, has the effect of easing the animal's fear and encouraging them to behave on their own initiative. Thus, the listing of this point as an unacceptable practice should be re-considered.

### **3. CHAPTERS on BOVINE SPONGIFORM ENCEPHALOPATHY (BSE)**

#### **GENERAL COMMENT**

Japan thanks the OIE and the relevant Specialist Commissions for their dedicated efforts on this major revision of BSE standards. Given that the adoption of the BSE chapters was deferred until next year and Members' comments would be further considered, Japan requests our last written comments submitted in advance of the 89<sup>th</sup> General Session be fully considered and addressed in the upcoming September meetings of the relevant Specialist Commissions.