

Japan's Comments on The Terrestrial Animal Health Standards Commission Reports of the February 2019 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 works they have done. Japan also appreciates the TAHSC for providing us with the opportunity to comment on the proposed revisions to the texts of Terrestrial Animal Health Code.

Please find our comments on the following texts and Annex:

Contents

1.	CHAPTER 12.6. INFECTION WITH EQUINE INFLUENZA VIRUS	2
2.	CHAPTER 7.Z. ANIMAL WELFARE AND LAYING HEN PRODUCTION SYSTEMS	3
3.	CHAPTER 10.4. INFECTION WITH HIGH PATHOGENICITY AVIAN INFLUENZA VIRUSES	4

1. CHAPTER 12.6. INFECTION WITH EQUINE INFLUENZA VIRUS

1) Proposal of amendment to Article 12.6.6. Recommendations for the importation of domestic equids for unrestricted movement (**insertion/deletion**)

Article 12.6.6.

Recommendations for the importation of domestic equids for unrestricted movement

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

[...]

3) were ~~immunised~~ vaccinated in accordance with the recommendations of the manufacturer with a vaccine complying with the standards described in the *Terrestrial Manual*, ~~between 21 and 90 days before shipment either with a primary course or a booster; information on their vaccination status should be included in the veterinary certificate or the passport in accordance with Chapter 5.12. in accordance with one of the following procedures:~~

a) between 14 and 90 days before shipment either with a primary course or a booster; or

b) between 14 and **180201** days before shipment, if they are older than four years of age, previously having received at least four doses of the same vaccine at intervals not greater than 180 days.

Information on the vaccination status should be included in the veterinary certificate or the passport in accordance with Chapter 5.12 as relevant.

Rationale

The intervals between boosters in many racing or equestrian authorities' regulations are usually expressed as bi-annual, twice a year, or every 6 months. These words have some interpretation width of, e.g. 6 months plus 21 days (FEI) or 6-8 months (British Horseracing Authority). These are probably to avoid vaccination just prior to competitions or races for fear of adverse effects. Therefore, we would like to recommend the author « at intervals not greater than 180 days » be amended to « at intervals not greater than 201 days ».

2. CHAPTER 7.Z. ANIMAL WELFARE AND LAYING HEN PRODUCTION SYSTEMS

Animal production systems have been developed to so diverse all over the world taking into account climate, culture, social environment and so forth.

For this reason, as Japan commented at 87th OIE General Session, due flexibility should be ensured when developing recommendations in animal welfare chapters taking into account diverse animal production systems.

Japan requests the Code Commission to allow sufficient discussion on this chapter at September 2019 meeting.

It should be noted that at 87th OIE General Session, the US on behalf of the OIE Americas Region commented that the last revised version is problematic because it excludes the commonly used conventional systems and requested the Code Commission to ensure focus on measurables based on scientific evidences as was done with the first proposed draft. Japan agrees with the US's comment and Paraguay, Colombia, India and Zimbabwe also expressed similar concern. Thus, Animal Welfare chapter has been a cause for many concerns and such comments should be carefully considered.

Besides, in the past discussions, it is agreed as follows.

As the RESOLUTION No. XIV of 70th OIE General Session of the World Assembly recommends that “as animal welfare is a complex, multi-faceted public policy issue that includes important scientific ethical, economic and political dimensions, the OIE develop a detailed vision and strategy to incorporate, balance and take account of these dimensions”.

It is also noted in the World Organisation for Animal Health (OIE) Global Animal Welfare Strategy that “animal welfare is a complex, multifaceted, international and domestic public policy issue with scientific, ethical, economic, legal, religious and cultural dimensions plus important trade policy implications”.

3. CHAPTER 10.4. INFECTION WITH HIGH PATHOGENICITY AVIAN INFLUENZA VIRUSES

Japan acknowledges that this chapter has been referred to the ad hoc group on avian influenza for scientific consideration after examining all comments submitted to the Code Commission in January 2019. As we commented on behalf of 32 Members of the Asia, the Far East and Oceania Region at the 87th OIE General Session, the OIE Code should be established taking into account the differences in risk between HPAI and LPAI, and the different production systems. Amendments to this chapter should be based on sound scientific evidence and we request the Code Commission to continue to consider all feedback from Members as it progresses.

More specifically, as we commented in January 2019, Japan understands that measures on domestic control and/or international trade in response to LPAI outbreak in poultry or AI cases in birds other than commercial poultry are determined taking into account the differences in risk.

On the other hand, Japan believes immediate notification on LPAI in poultry including backyard poultry should be retained in order to share the world's outbreak situation on real-time basis to prepare for the future HPAI outbreaks effectively as well as in the context of One-Health issue.

In addition, if backyard poultry are excluded from the definition of "poultry", such birds will not be subjected to LPAI monitoring. As mentioned above, Japan believes that it is important to monitor LPAI situation even if the birds are kept in a single household in order to prepare for the future HPAI outbreak as well as in the context of One-health issue. Thus, we believe such birds should be subjected to LPAI monitoring.

Japan strongly requests the Code Commission to be held in September 2019 taking into account those points in September meeting.