

Japan's Comments on the Terrestrial Animal Health Standards Commission Report of the September 2023 meeting

Japan extends its gratitude to the Terrestrial Animal Health Standards Commission (TAHSC) and other relevant Commissions, Working Groups, and *ad hoc* Groups for their diligent efforts in advancing their respective mandates. We also thank the TAHSC for affording us the opportunity to provide comments on the proposed revisions to the Terrestrial Animal Health Code. Please find our comments on the following texts:

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1. CHAPTER 4.X. BIOSECURITY

Specific Comments

- **Proposed amendments to Point 6 of Article 4.X.5**

6) ~~Farmer, veterinary and para-veterinary associations~~ Professional associations or industry groups representing farmers, veterinarians and veterinary paraprofessionals, animal feed companies, live animal transporters, and other relevant stakeholders should advocate and promote *biosecurity* among their members, including signposting to relevant training and advice.

Rationale:

Point 6 does not sufficiently cover the relevant stakeholders who may visit farms; therefore, amendments are proposed for clarity and completeness.

- **Proposed amendments to Point 1) f) of Article 4.X.8**

f) Transport vehicles in direct and indirect contact with animals or their products should undergo disinfection before and after use.

Rationale:

Due to the extreme difficulty in fully preventing contamination of transport vehicles in the field, Japan proposes disinfecting these vehicles both before and after use.

- **Comment to seek clarifications regarding Point 1) k) of Article 4.X.8**

Japan seeks clarification regarding what the term “other possible sources of pathogenic agents” means. We understand this could encompass, for instance, water reservoirs or natural surface waters near poultry farms frequented by wild birds. Is this interpretation accurate? Additionally, how does this term apply to other livestock species? We suggest that the wording be made more specific or supplemented with examples for clarity.

- **Proposed amendments to Point 1) I) of Article 4.X.8**

1) Potential carriers of pathogenic agents (e.g. people, vehicles, equipment, materials) should undergo cleaning and disinfection when entering or exiting a farm. When cleaning and disinfection or other measures are not feasible or effectiveness is undetermined, an additional period of no contact between potential carriers of pathogenic agents (~~e.g. people, buildings, vehicles, equipment, materials, pastures and air spaces~~) and the population can be applied. The effectiveness of this measure will depend on the specific circumstances.

Rationale:

To enhance the logic and coherence of the provision.

- **Proposed addition of text to Point 2) of Article 4.X.8**

2) Components of internal biosecurity:

The components outlined below may be implemented as relevant, taking into account factors such as species, type of production, and other specific characteristics.

a) Diseased animals should be isolated to prevent other animals being exposed. Treatments should be administered safely to avoid iatrogenic transmission.

[...]

Rationale:

Japan believes that preventing pathogenic agents from entering farms i.e. external biosecurity is of primary importance. On the other hand, internal biosecurity, which focuses on reducing the spread of pathogenic agents within a farm, may be considered where relevant.

2. CHAPTER 5.4. MEASURES AND PROCEDURES APPLICABLE IN THE EXPORTATION OF COMMODITIES

General Comments

The Codex Committee establishes standards for food import and export inspection and certification systems. Several existing Codex standards, including those currently under revision, are highly relevant to Chapters 5.4 and 5.6 of the Terrestrial Code. Examples of existing Codex guidelines include CXG 20, 'Principles for Food Import and Export Inspection and Certification,' CXG 47, 'Guidelines for Food Import Control Systems,' and CXG 60, 'Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification Systems.'

In light of this, to avoid duplicating efforts and to ensure alignment between the Terrestrial Code and Codex standards, we request that the WOA's standard-setting process be closely coordinated with the relevant Codex Committee. Additionally, careful consideration should be given to the future work plan and the timing of adoption.

3. CHAPTER 5.6. MEASURES AND PROCEDURES APPLICABLE IN THE IMPORTATION OF COMMODITIES

General Comments

The Codex Committee establishes standards for food import and export inspection and certification systems. Several existing Codex standards, including those currently under revision, are highly relevant to Chapters 5.4 and 5.6 of the Terrestrial Code. Examples of existing Codex guidelines include CXG 20, 'Principles for Food Import and Export Inspection and Certification,' CXG 47, 'Guidelines for Food Import Control Systems,' and CXG 60, 'Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification Systems.'

In light of this, to avoid duplicating efforts and to ensure alignment between the Terrestrial Code and Codex standards, we request that the WOA's standard-setting process be closely coordinated with the relevant Codex Committee. Additionally, careful consideration should be given to the future work plan and the timing of adoption.

Specific Comments

- **Proposed amendments to Article 5.6.2**

Article 5.6.2.

General considerations

The Veterinary Authority of the importing country should ensure that importing country requirements, ~~including international veterinary certificates~~, and up-to-date information relevant to the import procedures, including a list of the border inspection posts designated for the import and transit of those commodities are made available.

[...]

Rationale:

As long as the importing country's requirements are publicly accessible, it should be considered to make the model certificate or blank certificates available only as necessary and based on mutual agreement between the exporting and importing countries. Consequently, Japan proposes either to remove the specific reference to international veterinary certificate or to amend the text to reflect this perspective.

- **Proposed relocation of text in Point 1) b) of Article 5.6.3**

b) Identity check

Identity check should be performed upon arrival of consignment at the point of inspection, as a visual inspection to verify that the content and the labelling of a consignment, including the identification of commodities, seals and means of transport, correspond to the information declared in the international veterinary certificate and accompanying documents.

~~The frequency of checks, the quantity of commodities to be inspected as well as the criteria for sampling should be determined by the Veterinary Authority or other Competent Authorities of the importing country based on risk assessment.~~

Rationale:

The second paragraph, which pertains to sampling, should accordingly be relocated to Point 2 (Sampling and testing) for better relevance and organization.

- **Proposed amendment to Point 1) c) iii) of Article 5.6.3**

iii) Animal products

The Veterinary Authority or other Competent Authorities should carry out physical checks of the consignment to verify the compliance of the importing country's requirements including transport conditions with importing country requirements, including labelling and temperature records when relevant and the integrity of the packaging material.

~~The Veterinary Authority or other Competent Authorities may carry out physical checks to verify that the labelling complies with importing country requirements.~~

[...]

Rationale:

Proposed amendments aim to clarify that transport conditions and labelling requirements fall under the purview of the importing country's requirements.

- **Proposed amendment to Point 2) of Article 5.6.3**

2. Sampling and testing

Sampling and testing of imported commodities with a view to checking compliance with importing country's requirements ~~the health requirements laid down in the international veterinary certificate~~, may be performed following a risk-based sampling plan or upon suspicion of non-compliance resulting from the documentary, identity or physical checks of commodities. Testing should be performed in an approved laboratory.

Rationale:

For consistency of wording throughout the chapter.

- **Proposed amendment to Article 5.6.4**

Article 5.6.4.

Further action for non-compliant commodities

Commodities identified as non-compliant based on the performed import controls should not be released by the Veterinary Authority or other Competent Authorities and should be isolated under appropriate conditions pending further decision by the Veterinary Authority or other ~~the~~ Competent Authority.

[...]

Rationale:

For consistency of wording throughout the article.

- **Proposed amendment to Article 5.6.5**

Article 5.6.5.

Emergency plan

The Veterinary Authority or other Competent Authorities of the importing country should develop a plan to address the occurrence, within the exporting country after the commodities have been exported or within the transit country after the commodities have transited, of a listed disease or a disease referred to in the importing country requirements which may have impacted the status of the exported commodities. The Veterinary Authority or other Competent Authorities may also develop a plan to address the occurrence of a listed disease, or a disease referred to in the importing country requirements, within the importing country before the ~~animals~~ commodities have been released.

[...]

Rationale:

This provision is applicable not only to live animals but also broadly to commodities.

4. CHAPTER 6.10. RESPONSIBLE AND PRUDENT USE OF ANTIMICROBIAL AGENTS IN VETERINARY MEDICINE

General Comments

While food-producing animals are often viewed as economic assets, leading to treatment decisions based on a balance between the animal's economic value and the cost of treatment, non-food-producing animals, especially companion animals like dogs and cats, are frequently regarded as family members. Consequently, their treatment is often prioritized with less consideration given to cost.

Given this significant difference in the objectives of veterinary care between food-producing and non-food-producing animals, we request to have distinct, separate descriptions for the 'Responsibilities of veterinarians' in handling these two categories of animals.

Specific Comments

● **Proposed amendments to Point 3 of Article 6.10.6**

3. Appropriate use of the selected veterinary medicinal product

[...]

The veterinarian should ensure that instructions for the administration of the product are clearly explained and understood by the ~~food animal~~ breeder, owner or keeper of food-producing animals and non-food-producing animals.

[...]

Rationale:

Veterinarians treating non-food-producing animals are also obligated to thoroughly explain potential adverse effects and the likelihood of resistance development to breeders, owners, or keepers when administering antimicrobial agents to these animals.

5. CHAPTER 7.1. INTRODUCTION TO THE RECOMMENDATIONS FOR ANIMAL WELFARE

General Comments

Japan requests that the Code Commission provide comprehensive information on the ‘five domains’ concept to enhance understanding and ensure thorough explanation to relevant stakeholders. This includes:

- 1) Documents referenced in ‘Report of the September 2023 Meeting of the WOAHS Terrestrial Animal Health Standards Commission’, specifically:
 - a) ‘A background document’ prepared by the Secretariat and Animal Welfare Collaborating Centres (AWCC) to include the ‘five domains’ concept in Chapter 7.7 in response to the request from the TAHSC in its February 2022 meeting.
 - b) ‘A document to explain the ‘five domains’ concept to Members and how it is linked to the concept of ‘five freedoms’ currently used in the Code’ in response to the request from the TAHSC in its September 2022 meeting.
- 2) Detailed rationales and scientific evidence considered by the Code Commission for integrating ‘five domains’ concept in Chapter 7.1 instead of Chapter 7.7, based on the information mentioned in point 1 above.
- 3) Practical examples of the ‘five domains’ concept’s implementation in the livestock sector by Member countries.

Specific Comments

● Comment to seek clarifications regarding Article 7.1.5.

Japan requests that the Code Commission provide clarification on the rationale behind the removal of the word ‘parasites’ in points 2) and 8) of Article 7.1.5. Addressing parasite infestations, including those caused by coccidia, which lead to diarrhea or hematochezia, and ticks, which result in itching, anemia and transmission of pathogenic agents through bloodsucking, is crucial for the improvement of animal welfare.

6. CHAPTER 8.8. INFECTION WITH FOOT AND MOUTH DISEASE VIRUS

Specific Comments

● **Overarching comments to seek reconsideration of Articles 8.8.2 and 8.8.11**

Japan firmly opposes the proposed provisions allowing the importation of vaccinated animals from FMD free countries or zones where vaccination is practiced, into FMD free countries or zones where vaccination is not practiced, without affecting the latter's official FMD free without vaccination status. This issue, a major obstacle in the 2023 General Session, remains unresolved, as no new scientific evidence or alternative proposals have been presented. There is no logical basis in the first place for importing vaccinated animals into countries or zones free from FMD where vaccination is not practised, that, by definition, should not have vaccinated animals within their territories.

While the current Article 8.8.2 specifies management measures for animals in zoological collections following official emergency vaccination, the proposed draft Articles 8.8.2 and 8.8.11 for livestock do not include post-import management measures. Considering relative risk and consistency, imported vaccinated animals should be subject to more stringent measures than those for zoo animals, including individual identification, effective separation, and one-year surveillance.

Additionally, the absence of specifics regarding the purpose of such imports, and the maximum number of vaccinated animals allowed is concerning. The commingling of vaccinated and unvaccinated animals could lead to numerous seropositive detections, creating confusion in disease control efforts. Moreover, even with post-import management measures, their implementation could impose undue administrative and financial burdens on importing countries, potentially leading to trade disputes.

Japan urges the Code Commission to propose revised text at its February 2024 meeting that is acceptable to all Members, adhering to the principle of consensus. If consensus is unattainable, we request maintaining the current provisions, which prohibit the introduction of vaccinated animals into FMD free countries or zones without vaccination, except for direct slaughter.

- **Comment to seek improvement of Articles 8.8.40 – 8.8.42**

Japan recalls that in the February 2022 meeting of the Scientific Commission (SCAD), a recommendation was made to WOAHA to develop FMD surveillance guidelines. These guidelines were intended to assist Members in designing surveillance systems to address the impacts arising from the importation of vaccinated animals into FMD-free countries or zones where vaccination is not practiced. This issue was also highlighted in the September 2022 meeting of the TAHSC. However, it appears that the plan to develop these guidelines has been withdrawn. Japan underscores the urgency and importance of providing practical and effective guidance, either as an inclusion in this chapter or as separate guidelines. This becomes especially critical if the current proposal, which allows the importation of vaccinated animals from FMD-free countries or zones where vaccination is practiced into FMD-free countries or zones where vaccination is not practiced, remains part of the draft.

7. REQUEST ON LOW PATHOGENIC AVIAN INFLUENZA

A recent study by Xie, R. et al. (Nature, 2023, <https://doi.org/10.1038/s41586-023-06631-2>) has shown that the highly pathogenic avian influenza (HPAI) A (H5N1) clade 2.3.4.4b virus has evolved and acquired new characteristics. These include increased infectiousness to wild birds and a heightened ability to adapt to various species, achieved through genetic reassortment with low pathogenic avian influenza (LPAI) viruses. This evolution highlights the critical need for the control and elimination of these viruses, emphasizing measures such as early detection and prompt culling of affected poultry flocks. These are essential to reduce the likelihood of genetic reassortment and the emergence of more virulent HPAI strains.

In response to these findings, Japan strongly requests reinstating LPAI in poultry as a listed disease. The reinstatement of LPAI as a listed disease is crucial to effectively curb HPAI outbreaks, ensure timely notification to WOA, and enhance international information sharing.