

Annex 1

Comments on Terrestrial Animal Health Code from P.R. China

Article 7.5.13.

Text as presented:

3. Recommendations:

Ramps should be positioned so that the animals can be handled safely. There should be no gap between the *vehicle* and the ramp, the gradient should not be too steep, and side barriers should be in place.

Proposed alternative text:

3. Recommendations:

Ramps should be positioned so that the animals can be handled safely. There should be no gap between the *vehicle* and the ramp, the gradient should not be too steep, and side barriers should be in place and be a solid shield.

Rationale: The side barriers of unloading ramps, races or alleys to lairage or stunning point should also be a solid shield, so as to prevent animals from distractions that make animals stop, balk or turn back, such as people walking by, moving equipment.

It is only required to provide side barriers, but if the side barriers used are transparent or fenced, it is obviously not effective to protect animals from distractions.

Text as presented:

Preventive measures such as foot battens, rubber mats and deep groove flooring can help animals to avoid slipping.

Proposed alternative text:

Preventive measures such as steel floors welded with steel rods, foot battens, rubber mats and deep groove flooring can help animals to avoid slipping.

Rationale: The steel floors with steel rods welded to is commonly used to protect animals from slipping in slaughtering practice. However, it shall be noted that rods must be welded flush with the floor. Never overlap the rods.

Article 8.Y.12.

Text as presented:

For meat

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that the entire consignment of *meat*:

- 1) comes from *animals* which have been slaughtered in a *slaughterhouse/abattoir* and have been subjected to ante- and post-mortem inspections with favourable results; and

Proposed alternative text:

For meat

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that the entire consignment of *meat*:

1) comes from animals which originated from animals in which surveillance in accordance with Articles 8.Y.13. to 8.Y.16 demonstrates that no case of infection with animal trypanosomes of African origin has occurred in the past six months.

2) comes from animals which have been slaughtered in an approved slaughterhouse/abattoir and have been subjected to ante- and post-mortem inspections with favourable results; and

Rationale: Based on the need of food safety protection, it is necessary to limit the risks of introduction as far as possible. The monitoring of animals in the epidemic area from the production and feeding process is more conducive to the protection of food safety, and more in line with the principle of risk control, so as to effectively prevent the spread of diseases and parasites from entering the human food supply chain ; In Article 8.Y.5, it is stipulated that if a country or region regains epidemic-free status, continuous surveillance for six months is required and all results are negative, so it is recommended here that the group of animals to be slaughtered should have been free of animal trypanosomes of African origin for at least the last six months.

Article 8.15.65.

Text as presented:

3) ensuring *vehicles/vessels* do not stop en route during dawn or dusk, or overnight, unless the animals are held behind insect-proof netting;

Proposed alternative text:

3) ensuring *vehicles* do not stop en route during dawn or dusk, or overnight, unless the animals are held behind insect-proof netting or any equivalent measures that protect against any attacks by vectors;

Rationale: Insect-proof netting is just one of the protective measures. Measures that can protect the animals against any attacks by vectors should be adopted.

Article 11.4.1bis.

Text as presented:

4) gelatine and collagen;

Proposed alternative text:

4) gelatine and collagen [prepared from bones that skulls and vertebrae (excluding tail vertebrae) have been excluded];

Rationale: BSE of livestock have long incubation periods and insidious onset of signs, so cases may escape ante-mortem and post-mortem inspection. BSE agent is present at much higher titres in Specified Risk Materials, especially brain, skull, eyes, spinal cord and vertebral column). These tissues most likely to contain highest titres of BSE infectivity can survive the process for gelatine and collagen production. There is a risk that the resulting gelatine and collagen could retain BSE infectivity. So these tissues should not be used for the preparation of gelatine and collagen for human consumption or animal feed.

Article 11.4.3.

Text as presented:

1) A *risk assessment* as described in Article 11.4.2. has been conducted, and the Member Country has demonstrated through documented evidence that the likelihood of BSE agents being recycled in the cattle population has been negligible as the result of:

Proposed alternative text:

1) A *risk assessment*, as described in Article 11.4.2., has been conducted, and the Member Country has demonstrated through documented evidence that the likelihood of BSE agents being recycled in the cattle population has been negligible as the result of the feed ban of protein meal derived from ruminants to ruminants.

Text as presented:

Negligible BSE risk

4) Any *cases* of BSE that have been detected have been completely destroyed or disposed of to ensure that they do not enter the animal *feed* chain.

Proposed alternative text:

Negligible BSE risk

4) all classical BSE cases, as well as:

– all cattle which, during their first year of life, were reared with the BSE cases during their first year of life, and which investigation showed consumed the same potentially contaminated feed during that period, or

– if the results of the investigation are inconclusive, all cattle born in the same herd as, and within 12 months of the birth of, the BSE cases,

if alive in the country, zone or compartment, are permanently identified, and their movements controlled, and, when slaughtered or at death, are completely destroyed.

4) 5) Any *cases* of atypical BSE that have been detected have been completely destroyed or disposed of to ensure that they do not enter the animal *feed* chain.

Rationale: That the consumption by bovines of contaminated feed plays the only significant role in typical BSE transmission. Where a classical BSE case has been confirmed, all cattle which, during their first year of life, were reared with the BSE

case during his first year of life, and which have consumed the same potentially contaminated feed i.e. animals exposed to the same risk, should be identified and destroyed. If we don't do this ,there will be more BSE cases born after the feed ban.

Article 11.4.6.

Text as presented:

Recommendations for importation of cattle from a country, zone or compartment posing a negligible BSE risk

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that cattle selected for export came from a country, *zone* or *compartment* posing a negligible BSE risk.

Proposed alternative text:

Recommendations for the importation of cattle from a country, zone or compartment posing a negligible BSE risk but where there has been an indigenous classical BSE case

For cattle selected for export

Veterinary Authorities should require the presentation of an *international veterinary certificate* attesting that cattle selected for export came from a country, *zone* or *compartment* posing a negligible BSE risk.

1) are identified by a permanent identification system in such a way as to demonstrate that they are not exposed cattle as described in point 3 b) iii) of Article 11.4.3.;

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

Rationale: Deletion of this section is not recommended. There should be identification and traceability for the export of live cattle from any country, not just for BSE. Animal identification and traceability is one of the important measures to effectively control the disease and cut off the transmission risk chain, so is feed ban.

The selection of cattle born after the feed ban is crucial for risk monitoring in importing countries. It is recommended to make the same rules as Article 11.4.7, and identification is required even for the negligible BSE risk.

Article 11.4.9.

Text as presented:

2) have been subjected to an ante-mortem inspection with favourable results.

Proposed alternative text:

2) have been subjected to an ante-mortem inspection with favourable results.

3) in countries with negligible BSE risk where there have been indigenous cases, the cattle from which the fresh meat and meat products were derived were born after the date from which the ban on the feeding of ruminants with meat-and-bone meal and greaves derived from ruminants had been effectively enforced.

Rationale: The meat source cattle should also be born after the implementation of the feed ban, otherwise there is no need to implement the feed ban. It is recommended that this section also increase restrictions on cattle slaughter methods, such as point 4) in Article 11.4.10.

Article 12.6.6.

Text as presented:

3)

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

b) between 14 and 180 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.

Proposed alternative text:

3)

a) between ~~14- 21~~ and 90 days before shipment either with a primary course or a booster; or

b) ~~between-14- 21~~ and 180 days before shipment, if they are older than four years of age, previously having received at least ~~four~~ eight doses of ~~the same~~ vaccine at intervals not greater than 180 days.

Rationale: 1) vaccination requirement of equine influenza defined most bilateral protocol is as follow: The horse received no vaccinations during pre-export isolation.

2) requirements from most importing countries: Horses for export shall be subjected to pre-export isolation for 21-30 days.

3) Recommendations by OIE: Article 12.6.6.(2) came from a country, zone or compartment not known to be free from EI, were subjected to pre-export isolation for 21 days.

4) if horses, older than four years of age, were vaccinated at intervals not greater than 180 days., they previously having received at least eight doses.