

Japan's Comments on the Terrestrial Animal Health Standards Commission Reports of the February 2020 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.

Note that regarding "Draft new chapter on animal welfare and laying hen production systems(Chapter 7.Z)" , Japan acknowledges the current version of the chapter duly takes into consideration the wide range of production systems and therefore, Japan considers there is no need for submitting further comments on this chapter.

Contents

1. Infection with avian influenza viruses (Chapter 10.4)	2
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1. Infection with avian influenza viruses (Chapter 10.4)

1) General comments

Japan has been making a point that some lineage of Low Pathogenicity Avian Influenza (LPAI) virus such as Chinese lineage of H7N9 causes human infection with severe health consequences thus such LPAI meets the listing criteria regarding human health implication. Therefore, Japan appreciates and supports the proposed modification of the list of notifiable disease of OIE to include a new indent, "Infection of domestic and captive wild birds with low pathogenicity avian influenza viruses having proven natural transmission to humans associated with severe consequences" which was proposed based on the same view.

On the other hand, Japan would like to bring up some points to be considered when applying this modification in practice.

- a) The procedures to determine "LPAI having proven natural transmission to humans associated with severe consequences" should be defined in advance.

Rational

The manifestation of symptoms of infection of LPAIV in humans may vary from asymptomatic to fatal depending on virulence of virus, differences in levels of exposure, susceptibility in human population and socioeconomical factors even with same serotype. Therefore, the LPAI strain/lineage to be included in the list can be widely divergent depending on what determines "severe" in this context.

Furthermore, although LPAI with severe zoonotic potential should be designated as notifiable as soon as possible for the purpose of early warning in member countries, several human cases need to be collected and analyzed in order to identify the severity of the human infection caused by newly identified zoonotic LPAI. Thus consideration should be made to designate such LPAI as notifiable at the beginning when the severity in human population is yet inconclusive and then decide whether preclude from the list or maintain in the list once sufficient information about severity in humans are gathered.

Japan requests to develop the procedures for designating strains/lineage of LPAI strain as a notifiable zoonotic LPAI taking into account those aspects.

- b) The standards/guidance should be developed for safe international trade of live animals regarding zoonotic LPAI.

Rational

The recommendation for international trade of animals and animal products regarding LPAI including zoonotic ones will not be included in the modified HPAI chapter.

Japan understands that the measures on international trade of animal products

such as fresh meat is not necessarily same between HPAI and LPAI considering the differences in virulence and impact. However, Japan would like to note that the risk of international spread of zoonotic LPAI by trade of live birds including day-old chicks and pet birds should not be ignored and standards or guidance for safe trade of live birds regarding zoonotic LPAI should be developed from a public health standpoint.

- c) Mechanism to collect and analyze the information on occurrence of delisted LPAI should be considered.

Rational

The occurrence of the OIE listed diseases are subjected to immediate notification and 6-monthly reports. Periodical report is valuable to obtain epidemiological information including disease situation in a single country, global disease distribution, long-term trend of diseases occurrence while Immediate notification enables each country to increase vigilance for incursion of the disease such as strengthening border controls. Since delisting of LPAI other than zoonotic ones associated with severe human consequences subsequently deprive the opportunity to collect epidemiological information on LPAI through immediate notification and 6-monthly reports, OIE should make effort in keep collecting and analyzing information on occurrence of LPAI by periodical reporting or by any other means in order to better prepared for the future mutations and zoonotic events.

2) Proposal of amendment to Article 10.4.22.ter (**insertion**)

Article 10.4.22.ter

Monitoring of low pathogenicity avian influenza in *poultry* populations

Outbreaks of low pathogenicity avian influenza viruses can be managed at the *establishment* level; however, spread to other *poultry establishments* increases the risk of virus mutation, particularly if it is not detected and managed. Therefore, a *monitoring* system that includes awareness and reporting should be in place. Such monitoring system may be applied for enabling early detection of the occurrence of LPAI naturally transmitted to humans associated with severe consequences in domestic and captive wild birds.

Rationale

Monitoring of LPAI in poultry in poultry population is important in order to detect the spread of LPAI in poultry populations promptly and reducing the risk of mutation to high pathogenicity by taking necessary control measures.

On the other hand, from public health standpoint, it is also important to ensure early detection of zoonotic LPAI in domestic birds. Therefore, expansion of monitoring system for LPAI in poultry population to other domestic birds should be encouraged when signs of increased risk of zoonotic LPAI is observed. (i.e. recent detection of zoonotic LPAI in surrounding area)