Japan's Comments on The Terrestrial Animal Health Standards Commission Reports of the September 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.

Contents

1. Slaughter of animals (Chapter 7.5)

1) Proposal of amendment to Article 7.5.1. (insertion/~~deletion~~)

Article 7.5.1.

Introduction

Providing good welfare to the animals at *slaughter* is ethically and economically beneficial. The implementation of animal welfare measures contributes to the improvement of worker's safety, ~~and~~ product quality~~,~~ and ~~is essential for~~ food safety [Blokhuis *et al.*, 2008; Lara and Rostagno, 2018].

Rationale

For consistency with paragraph 7 of Article 7.1.2. (Guiding principles for animal welfare) which indicates that improvements of animal welfare can often improve food safety.

2. Draft new chapter on animal welfare and laying hen production systems (Chapter 7.Z)

1) General comment

First of all, Japan would like to express once again its position on chapters of Section 7 (animal welfare).

Japan believes that the recommendations of animal welfare code in the OIE code should ensure flexibility.

Animal production systems have been developed so diversely all over the world taking into account climate, culture, food safety, social environment and so forth. In addition, considering the complex and multi-faceted nature of the animal welfare that includes scientific, ethical, economic and political dimensions, OIE is required to develop detailed vision and strategy to incorporate, balance and take account of these dimensions (resolution XIV of the 70th OIE General Session).

It is reported that each poultry production system has advantages and disadvantages (C. M. Sherwin *et al.*, 2019, H. J. Blokhuis *et al*., 2007,) and cultural backgrounds also varies country to country.

For example, in Japan, egg consumption is very large (e.g. the annual consumption of eggs per capita exceeds 300), and people are accustomed to eat raw eggs. Climate is warm and humid, and the land area is small. To achieve stable supply of safe eggs while taking into account the poultry animal welfare under such production environment, diverse production systems should be accepted.

Thanks to the TAHSC's consideration for comments for the second draft (including Japanese comments) requesting to allow flexibility and diversity, the Chapter 7.Z. was modified to allow flexibility which is close to the first draft.

We would like to thank for TAHSC and the *Ad Hoc* Group for their considerable work.
In order to ensure such diversity throughout the chapter, Japan would like to make some comments on Chapters 7.Z. as follows.

<Reference>

C. M. Sherwin *et al.*, 2019: Comparison of the welfare of layer hens in 4 housing systems in the UK: British Poultry Science Volume 51, Number 4 (August 2010), pp. 488—499

H. J. Blokhuis *et al.*, 2007: The LayWel project: welfare implications of changes in production systems for laying hens: World's Poultry Science Journal, Vol. 63, March 2007

2) Proposal of amendment to Article 7.Z.2. (insertion/~~deletion~~)

Article 7.Z.2.
Scope ... This chapter should be read in conjunction with Chapters 6.5., 7.1., 7.2., 7.3., 7.4., 7.5.~~and~~ 7.6.~~,~~ and Section 4.

Rationale

Because “freedom from disease” is also important for the animal welfare of layer pullets and laying hens, it is necessary to include references to the sections relating to the prevention and control of disease.

3) Comment on Article 7.Z.4.

Article 7.Z.4.
Recommendations for layer pullets and laying hens … Each recommendation includes a list of relevant outcome-based criteria or measurables derived from Article 7.Z.3. and when appropriate other criteria or measurables. The suitability of some of these criteria or measurables should be determined in accordance with the system in which the pullets and hens are housed.

Comment

Japan supports modification made to this part since this article clearly allows diverse production systems.

4) Proposal of amendment to Article 7.Z.9. (~~deletion~~)

Article 7.Z.9.

Flooring

The slope, design and construction of the floors should provide adequate support for the ~~locomotion of~~ layer pullets and laying hens, prevent injuries and entrapments, ensure good health ~~and allow the performance of normal behaviour~~.

Rationale

The primary purpose of any flooring is to provide support for the layer pullets and laying hens. 'locomotion' is one of behaviours of pullets and hens and is affected not only by the flooring but also by other factors of housing system. Thus, it is not necessary to include “locomotion” in this article which may associate with specific production system.

We propose to delete the last part of the sentence because it is not clear what does “the performance of normal behaviour” refer to since there is no definition for “normal behaviour” provided.

5) Proposal of amendment to Article 7.Z.10. (~~deletion~~)

Article 7.Z.10.

Dust bathing areas

~~Access to friable, dry substrate to encourage dust bathing is desirable.~~ When provided, dust bathing areas should be designed and positioned to encourage dust bathing, allow synchronised behaviour, prevent undue competition and not cause damage or injuries. Dust bathing areas should be easy to inspect and maintain [Weeks and Nicol, 2006].

Outcome-based measurables include: dust bathing, incidence of diseases, *infections* and *infestations*, injury rate and severity, plumage condition and spatial distribution.

Rationale

Japan would like to express our appreciation for the modification to include “incidence of diseases, *infections* and *infestations*” in the outcome-based measurables in line with the previous Japanese comment.

Japan proposes deleting the sentence containing "desirable" for the following reasons.

First, dust bathing is already defined as a "behaviour providing body maintenance benefits" as outcome-based criteria in Article 7.Z.3, so there is no need to re-state "desirable". Such note may raise suspicion that recommendations for other part of the chapter are “not so desirable". Thus, it will be appropriate to include only

recommendations specific to each article.

Second, the first sentence of the Article 7.Z.10 gives an impression that providing substrate is desirable all the time, but Japan would like to note that providing substrate in poultry housing may not be desirable in some cases as we have already presented some examples in previous comment. In addition, it has been reported that the aviary system where hens have access to dust bathing areas has a negative impact on the respiratory health of worker compared to conventional cages, resulting in a worse working environment (Mitchell. D. *et al.*, 2015). As a result, the workers will rather poorly observe the layer pullets and laying hens, which may negatively affect the animal welfare.

<Reference>

Mitchell. D. *et al.*,2015: Cage Versus Noncage Laying-Hen Housings: Worker Respiratory Health.

6) Proposal of amendment to Article 7.Z.11. (~~deletion~~)

Article 7.Z.11.
Foraging areas ~~Access to substrate that encourages foraging behaviour activity is desirable.~~ When provided, foraging areas should be designed and positioned to encourage synchronised behaviour, prevent undue competition and not cause damage or injuries. Foraging areas should be easy to inspect and maintain. Outcome-based measurables include: foraging behaviour, incidence of diseases, *infections* and *infestations*, injurious feather pecking and cannibalism, injury rate and severity and spatial distribution.

Rationale

Japan would like to express our appreciation for the modification to include “incidence of diseases, *infections* and *infestations*” in the outcome-based measurables in line with the previous Japanese comment.

Japan proposes deleting the sentence containing "desirable" for the following reasons.

First, foraging behaviour is already defined as a "motivated behaviour" as outcome-based criteria in Article 7.Z.3, so there is no need to re-state "desirable". Such note may raise suspicion that recommendations for other part of the chapter are “not so desirable". Thus, it will be appropriate to include only recommendations specific to each article.

Second, the first sentence of the Article 7.Z.11 gives an impression that providing substrate is desirable all the time, but Japan would like to note that providing substrate in poultry housing may not be desirable in some cases as already presented in our previous comment. In addition, it has been reported that the aviary system where hens

have access to foraging areas has a negative impact on the respiratory health of workers compared to conventional cages, resulting in a worse working environment (Mitchell. D. *et al.*, 2015). As a result, the workers will rather poorly observe the layer pullets and laying hens which may negatively affect the animal welfare.

<Reference>

Mitchell. D. *et al.*, 2015: Cage Versus Noncage Laying-Hen Housings: Worker Respiratory Health.

7) Proposal of amendment to Article 7.Z.12. (insertion/~~deletion~~)

Article 7.Z.12.
Nesting areas ~~Access to nesting areas is desirable.~~ When provided, nesting areas should be built of suitable materials, and designed and positioned to encourage nesting, prevent undue competition and not cause damage or injuries. Nesting areas should be easy to inspect, clean and maintain. Outcome-based measurables include: incidence of diseases, *infections* and *infestations*, injurious feather pecking and cannibalism, injury rate and severity, nesting, performance (mis-laid or floor eggs), and spatial distribution.

Rationale

Japan would like to express our appreciation for modification to include “incidence of diseases, *infections* and *infestations*” in the outcome-based measurables in line with the previous Japanese comment.

Japan proposes deleting the sentence containing "desirable" for the following reasons.

First, nesting is already defined as a "motivated behaviour" as outcome-based measurables in Article 7.Z.3, so there is no need to re-state "desirable". Such note may raise suspicion that recommendations for other part of the chapter are “not so desirable". Thus, it will be appropriate to include only recommendations specific to each article.

Second, the first sentence of the Article 7.Z.12 gives an impression that providing access to the nesting area is desirable all the time, but Japan would like to note that providing access to the nesting area may not be desirable in some cases as already presented in our pervious comments. In addition, the aviary system where hens have access to nesting area has a negative impact on the respiratory health of the workers compared to conventional cages, resulting in a worse working environment (Mitchell. D. *et al.*, 2015). As a result, the workers will rather poorly observe the layer pullets and laying hens, which may negatively affect the animal welfare.

<Reference>

Mitchell. D. et al., 2015: Cage Versus Noncage Laying-Hen Housings: Worker

Respiratory Health.

8) Proposal of amendment to Article 7.Z.13. (insertion/~~deletion~~)

Article 7.Z.13.
Perches ~~Access to perches is desirable.~~ When provided, perches should be built of suitable materials, designed, elevated and positioned to encourage perching by all layer pullets and laying hens, prevent undue competition, minimise keel bone deformation, foot problems or other injuries, and to ensure stability during perching. In the absence of designated perches, other structures such as platforms, grids or slats that are perceived by the pullets and hens as elevated and that do not cause damage or injuries, may be a suitable alternative. When provided, perches or their alternatives should be made available from an early age, be easy to clean and maintain, and be positioned to minimise faecal fouling [Hester, 2014; EFSA, 2015]. Outcome-based measurables include: foot problems, injurious feather pecking and cannibalism, incidence of diseases, *infections* and *infestations*, injury rate and severity, perching, plumage condition, resting and sleeping and spatial distribution.

Rationale

Japan proposes deleting the sentence containing "desirable" for the following reasons.

First, perching is already defined as a "motivated behaviour" as outcome-based measurables in Article 7.Z.3, so there is no need to re-state "desirable". Such note may raise suspicion that recommendations for other part of the chapter are “not so desirable". Thus, it will be appropriate to include only recommendations specific to each article.

Second, the first sentence of the Article 7.Z.13 gives an impression that providing access to perches is desirable all the time, but Japan would like to note that perches may not be desirable in some cases as already presented in our previous comments. In addition,it was reported that providing perches can increase the risk of accidents such as foot and leg fracture [V.Sandilands.et al.,2009; P.Y.Hester.et al.,2013].

Like other articles, ‘incidence of diseases, infections and infestations’ should be added in outcome-based measurable.

<Reference>

V. Sandilands, C. Moinard and N.H.C. Sparks: Providing laying hens with perches: fulfilling behavioural needs but causing injury?

P. Y. Hester ,*1 S. A. Enneking ,* B. K. Haley ,* H. W. Cheng ,† M. E. Einstein ,* and D. A. Rubin: The effect of perch availability during pullet rearing and egg laying on musculoskeletal health of caged White Leghorn hens

9) Proposal of amendment to Article 7.Z.26. (insertion)

Article 7.Z.26.

Contingency plans

The contingency plans should be consistent with national programmes established or recommended bu Veterinary Services. Evacuation procedures should be a part of the plan in case evacuation of animals is applicable. Humane emergency killing procedures should be a part of the plan and be in accordance with the methods recommended in Chapter 7.6.

Rationale

Consideration should be given in case evacuation of animals is possible before deciding euthanasia.

3. Infection with avian influenza viruses (Chapter 10.4)

1) General comment

Japan opposes the deletion of LPAI from the OIE disease list based on the result of the assessment done by ad-hoc group.

Japan agree with taking different response on international trade against occurrence of the outbreak of High Pathogenicity Avian Influenza(HPAI) and Low Pathogenicity Avian influenza(LPAI) taking into account the difference in pathogenicity and disease epidemiology. On the other hand, as clearly indicated in the Chapter 1.2, the OIE disease list is developed to ensure transparency, timely and constant disease notification and reporting in order to prevent spread of important animal diseases including zoonotic disease. LPAI has sufficient reason to be included in the disease list because it can be evolved to HPAI or zoonotic disease.

More specifically, according to the report, ad-hoc group concluded the listing criteria 4(a) which assess the impact on human health was “inconclusive” because occurrence of infection to humans with H5 and H7 LPAI is not frequent. However, as indicated in the same report, ad-hoc group identified the severe outcomes to human health including high mortality caused by H7N9 LPAI infection. Thus, it is not appropriate to conclude that LPAI does not meet the listing criteria regarding human health implication. WHO also recognises H7N9 influenza as a zoonotic disease with severe health consequences which requires close monitoring.

Regarding the listing criteria 4(b) for impact on domestic animals, considering that some LPAI cause decrease in productivity and/or can be evolved to HPAI, it is not appropriate to conclude that LPAI does not pose negative impact on domestic animals.

Japan concerns that it will be extremely difficult to assess the global LPAI situation once LPAI is excluded from the OIE disease list and from obligation for immediate notification as well as 6-months report. Japan believes it is highly important to share LPAI information among member countries through WAHIS’s notification/reporting system in order to detect any change in pathogenicity and zoonotic potential at an early stage.

Although Japan respects the OIE’s role for establishing international standards to ensure safe and smooth trade, Japan believes collection, analysis, sharing of information on animal and zoonotic disease and facilitate international coordination to fight against transboundary disease is one of the most important function of the OIE as an international organisation targeting every animal and zoonotic disease. Japan has high expectation for the ongoing OIE-WAHIS renovation project especially for the enhanced function for data collection and analysis of disease outbreak situation all over the world. In this context, Japan would like to express our concern that the revision of the Code in direction to limit the disease to be notified/reported to the OIE may discourage OIE’s effort on strengthening transparency in accordance with the 6th strategic plan.

2) Comment on Article 10.4.4

Article 10.4.4.

Recommendations for the importation of live birds other than poultry

Regardless of the high pathogenicity avian influenza status of the country of origin, *Veterinary Authorities* should require the presentation of an *international veterinary certificate* attesting that:
1) on the day of shipment, the birds showed no clinical signs of avian influenza;
2) the birds had been kept in isolation facilities approved by the *Veterinary Services* since they were hatched or for at least 28 days (i.e. two *flock*-level *incubation periods*) prior to shipment and showed no clinical signs of avian influenza during the isolation period;
…

Comment

Concerning the subparagraph 2 of Article 10.4.4, Japan would like clarification on the reason for the change of the isolation period of live birds other than poultry from 21 days to 28 days. In the current code, the length of the isolation period is 21 days, which is equal to the incubation period for avian influenza. If the isolation period is determined based on the incubation period, it should be 14 days considering that the revised incubation period (at the flock-level) for HPAI is 14 days. Such change will affect international trade on live birds directly. Japan would like to know scientific rational for using “two” flock-level incubation periods instead of one.

3) Proposal of amendment to Article 10.4.22.ter (insertion)

Article 10.4.22.ter

Monitoring of low pathogenicity avian influenza in *poultry* and domestic birds other than *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. In addition, *monitoring* of H5 and H7 low pathogenicity avian influenza in domestic birds other than *poultry* populations should also be conducted.

Monitoring the presence of low pathogenicity avian influenza viruses can be achieved through a combination of clinical investigation when *infection* is suspected because of changes in production parameters, such as reductions in egg production or *feed* and water intake, and active serological and virological *surveillance*.

Rationale

Japan understands it is scientifically sound that birds which are kept in a single household and whose products are only used in the same household are not considered to be *poultry*. On the other hand, those birds should be included in the *monitoring* system for H5 and H7 low pathogenicity avian influenza in addition to *poultry* considering the potential to be zoonotic because those birds also have close contact with humans through daily husbandry management.

4. Bovine spongiform encephalopathy (Chapter 11.4)

1) General comment

Japan acknowledges that the revision of this chapter is reasonable in a scientific view considering we are on the tail end of an epidemic of the disease.

Regarding the revision on surveillance requirements, we understand that the current point-based surveillance is better be replaced with risk-based passive surveillance. If the revision is adapted, member countries should develop a risk-based surveillance system by themselves. In order to support smooth transition of surveillance system in each member country according to the revised code, Japan would like to request OIE to provide the result of verification/assessment of the current surveillance system especially on cost-effectiveness, pros/cons and its achievement.

Japan also would like to emphasize that to make passive surveillance work effectively, it is important to have robust reporting system which ensures every clinical suspect is properly reported to the Veterinary Authority in a timely manner.

In addition to that, to apply the concept that the likelihood of BSE being recycled is negligible in a country without feed ban depending on livestock industry practice when determining BSE official status, it is essential for Veterinary Authority of the country to have complete knowledge and supervision of livestock industry practice, including feeding, in the country.

Considering these points, Japan believes OIE should evaluate capacity and competence of the Veterinary Service and Veterinary Authority thoroughly more than ever when recognizing BSE official status. PVS may be one of the tools to be used for such assessment.