

**NEW ZEALAND'S COMMENTS
ON
THE REPORT OF THE FEBRUARY 2011 MEETING
OF
THE OIE TERRESTRIAL ANIMAL HEALTH STANDARDS COMMISSION**

4 July 2011

New Zealand thanks the Terrestrial Animal Health Standards Commission (TAHSC) for its work and for the opportunity to offer comment on proposed revisions to *Terrestrial Animal Health Code* texts.

CHAPTER 1.2. CRITERIA FOR LISTING DISEASES

General comment: We are supportive of the proposed amendments to the process for listing diseases. As at least part of the reason for changing the criteria was because some OIE Members considered that the current list of diseases is too long, we consider the proposed changes an improvement. Although the proposed new criteria are very similar to the current ones, the replacement of the first “or” in the current criteria with an “and” may screen out a number of diseases.

The proposed new criterion of significant negative effect on wildlife is also an important enhancement in the decision-making process. Its inclusion addresses one of the recommendations of the Convention on Biological Diversity's Ad Hoc Technical Group Meeting on Addressing the Risks Associated with the Introduction of Alien Species as Pets, Aquarium and Terrarium Species, as Live Bait and Live Food, Geneva, 16-18 February 2011. The position of this wildlife criterion in the hierarchy should insure that it does not lead to a great increase in the number of diseases to be listed.

We note that the decision tree, which will be important for easy visualisation of the process, will be modified only after the new text is adopted.

Proposed new introductory Article to be inserted before Article 1.2.1.

Proposed new text: The objective of listing diseases is to support Members' efforts to prevent the transboundary spread of animal diseases. Each listed disease will have a corresponding chapter in the *Terrestrial Animal Health Code* recommending sanitary measures applicable to the trade in animals and animal products. Listing diseases assists harmonisation of trade in animals and animal products through the transparent application of simple, consistent criteria.

Rationale: The proposed introduction to the Chapter states the objective of the listing process in a manner that links it to the purpose of the *Terrestrial Animal Health Code*.

Article 1.2.1.

Proposed alternative text:

The criteria for the inclusion of a *disease* in the OIE List are as follows:

1. [...]

- i) A number of countries with populations of susceptible animals are free of from the ~~disease~~/infection or face impending freedom without the use of

vaccination (based on the animal health surveillance provisions of the *Terrestrial Code*, in particular those contained in Chapter 1.4.)

[...]

Rationale for proposed alternative text: Countries where the expression of clinical disease is suppressed because of vaccination would be included in this criterion. For consistency with the rest of the *Code*, the term “freedom” should be qualified with “with or without vaccination”, unless both situations are considered of equal status when defining a disease as notifiable.

Comment: Some of our experts consider the term “disease/infection” could be a basis for confusion. Freedom from infection requires the absence of the causal agent. Therefore, in this Chapter “freedom” should refer to the absence of infection, not just the absence of clinical disease, which could be absent where vaccination is practised. Although the criterion refers to the provisions of the Chapter on surveillance, it should be made clear that countries must be free from infection or disease agents, not just from clinical disease.

Article 1.2.1.

Proposed deletion:

ii) ~~— OIE annual reports indicate that a number of countries with susceptible populations have reported absence of the disease for several consecutive years (based on the animal health surveillance information notified in WAHIS)~~

Rationale for proposed deletion: This clause is not necessary. The two statements in the text as written are essentially the same thing, but ii) is presenting the manner in which this information might come to be known or assessed. A single statement indicating some countries have free populations is sufficient, and the reference to the surveillance provisions of the *Code* remains valid.

Article 1.2.1.

Proposed alternative text:

1. [...] AND

i) Transmission to humans (except under artificial circumstances) has been proven and human infection is associated with severe consequences (death or serious illness)

Rationale for proposed alternative text: This exception clause is in the current *Code* and should be retained.

Article 1.2.1.

Proposed alternative text:

1. [...] OR

- ii) The disease/infection has been shown to cause significant ~~production losses~~ mortality or morbidity in domestic animals at the level of a country, zone, or compartment, ~~excepting the situation where there is an efficient and affordable vaccine and vaccination is carried out by most Members~~

Rationale for proposed alternative text: (a) 'Significant production losses' is potentially ambiguous as the *Code* does not define 'production' or 'production losses'. We recognise that the *Code* does not currently define 'significant mortality' or 'significant morbidity' but consider the current *Code* wording 'significant mortality or morbidity' is tested. (b) Inclusion of a mitigation measure (vaccination) in the categorisation of the importance of a disease is not appropriate. Consideration of whether a vaccine is appropriate to provide sufficient protection for disease spread should be made in the individual disease *Code* chapter, not in the listing criteria. Furthermore, "affordable" is a relatively subjective term; what may be "affordable" to an intensively-managed agro-industrial enterprise in a developed country may not be affordable to many farmers in the developing world. We see potential here for dispute as we consider "affordable" to be a subjective term open to broad differences in interpretation.

Article 1.2.1.

Proposed alternative text:

1. [...] OR

- iii) The disease/infection has been shown to, or sufficient scientific evidence indicates that it would, ~~have a~~ cause significant ~~negative effect on~~ mortality or morbidity in wild animal populations.

Rationale for proposed alternative text: (a) It is essential to have *sufficient* scientific evidence from more than one independent source in order to make a critical assessment of the information. It often happens that only one research current publishes information on a topic, especially with research on wildlife where resources and funding are limited. Hence this criterion is only valid if there is *sufficient* information on which to build a critical assessment of the evidence. (b) 'Negative effect' is imprecise and subjective. 'Significant mortality or morbidity' is a term which has been tested through usage.

Article 1.2.1., paragraph 2

Proposed alternative text:

The disease is an *emerging disease* of animals with apparent evidence of zoonotic properties, rapid spread, or ~~possible~~ significant ~~production losses~~ mortality or morbidity and a case definition is available to clearly identify cases and allow them to be distinguished from other pathologies.

Rationale for proposed alternative text: The definition of emerging diseases includes animal or human diseases, and specifying that this refers to animal diseases narrows the listing criteria. "Apparent" should be replaced by "evidence of" because the *Oxford English Dictionary* gives two definitions for "apparent"; either 1. visible and plainly seen, or 2. seeming. In this Article it is the former, rather than the latter, that is meant. 'Possible' lacks rigour. 'Significant production losses' is potentially

ambiguous while 'significant mortality or morbidity' is a tested term. Further, 'significant mortality or morbidity' covers emerging diseases of wildlife whereas 'production losses' does not.

Article 1.2.2., section 1

Proposed alternative text:

- [...]
- New world screwworm (*Cochliomyia hominivorax*)
- Old world screwworm (*Chrysomya bezziana*)
- [...]

Rationale: Correct spelling. We note that *Chrysomya bezziana* is also spelled incorrectly in Chapter 8.8. and recommend that the TAHSC correct it there as well.

CHAPTER 12.1. AFRICAN HORSE SICKNESS

Article 12.1.2.

Proposed alternative:

4. [...]
 - b) [...]
 - ii) no systematic vaccination against AHS has been carried out during the past 12 months in the country or zone;

Rationale for proposed alternative text: It does not matter whether it is systematic vaccination or not, vaccination of any sort should not be applied.

Article 12.1.2.

Proposed alternative:

4. [...]
 - c) [...]
 - i) if appropriate to the section in Article 12.1.2.1 on which the application is based, surveillance in accordance with Articles 12.1.11. to 12.1.13 is applied;

Rationale: Clarity. Sections a) and b) of Article 12.1.2.1 for an AHSV free country or zone do not require an active surveillance programme to be undertaken.

Article: 12.1.2.

Proposed alternative text:

5. The Member will be included in the list only after the submitted evidence has been accepted by the OIE. Retention on the list requires that the information in points 4b) ii) and iii) and 4c) **ii)** above be re-submitted annually and changes in the epidemiological situation or other significant events should be reported to the OIE according to the requirements in Chapter 1.1., and in particular, formally state that :

Rationale for proposed alternative text: It is unnecessarily burdensome to require countries recognised as free from AHS to undertake on-going active surveillance to retain their status provided 4b) ii) and iii), and 4c) ii) have been implemented.

Article 12.1.4.bis., paragraph 1

Proposed alternative text:

- g) no new cases have been found in the *containment zone* within a minimum of two *infectious infective periods* as defined in Article 12.1.1.;

Rationale for proposed alternative text: *Infective period* is the term defined in the glossary of the *Terrestrial Animal Health Code* and is the term used elsewhere in the document.

Article 12.1.13.

Proposed alternative text:

5. Vector surveillance

[...]

~~The main purpose of v~~ Vector surveillance is to aimed at demonstrating the absence of vectors or define defining high, medium and low-risk areas and local details of seasonality by determining the various species present in an area, their respective seasonal occurrence, and abundance. *Vector surveillance* has particular relevance to potential areas of spread. Long term *surveillance* can also be used to assess *vector* abatement measures, or to confirm continued absence of vectors.

Rationale for proposed alternative text: New *Code* text should always be as close as possible to existing *Code* text. Currently, Article 1.4.1. states that "... *surveillance* is aimed at demonstrating the absence of *disease* or *infection*... etc". The text as presented here in Article 12.1.13. assumes that the vector is present. Surveillance may be carried out to demonstrate absence of vectors. If vectors are known to be absent and abatement measures are not necessary, long term surveillance at high risk sites has the purpose of confirming continued absence, as is the case in New Zealand.