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Dear Dr. David:

We have reviewed the proposed amendments resulting from the September 2007 meeting of the Terrestrial Animal Health Standards Commission and provide the following comments.

GENERAL DEFINITIONS – ARTICLE 1.1.1.1

Risk assessment

means the evaluation of the likelihood and the biological and economic consequences of entry, establishment, **or and** spread of ~~a pathogenic agent~~ hazards within the territory of an *importing country*.

Sanitary measure

means ~~any~~ a measure applied, such as those described in various chapters of the *Terrestrial Code*, designed to protect animal or human health or life within the territory of the Member ~~Country~~ from *risks* arising from the entry, establishment **or** spread of a *hazard*. ~~[Note: A detailed definition of sanitary measure may be found in the Agreement on the Application of Sanitary and Phytosanitary Measures of the World Trade Organization.]~~

Comment - In the definition of 'risk assessment' "and" was substituted for "or" but in a similar phrase in the definition for 'sanitary measure' the substitution did not occur. For consistency, the change should be made in the definition for 'sanitary measure.'

ZONING AND COMPARTMENTALISATION – CHAPTER 1.3.5, ARTICLE 1.3.5.3.

Principles for defining a zone or compartment, including containment zone

In conjunction with the above considerations, the following principles should apply when Members define a *zone* or a *compartment*.

1. <Snip>
2. Establishment of a *containment zone* should be based on a rapid response including appropriate standstill of movement of **animals and commodities** upon notification of suspicion of the specified *disease* and the demonstration that the *outbreak* is contained within this *zone* through epidemiological investigation (trace-back, trace-forward) after confirmation of *infection*. The *primary outbreak* and likely source of the *outbreak* should be identified and all *cases* shown to be epidemiologically linked. For the effective establishment of a *containment zone*, it is necessary to demonstrate that there have been no new *cases* in the *containment zone* within a minimum of two *incubation periods* from the last detected *case*.

A *stamping-out policy* or another effective control strategy should be applied and the **susceptible animal** population within the *containment zones* should be clearly identifiable as belonging to the

containment zone. Increased passive and targeted surveillance in accordance with Appendix 3.8.7. in the rest of the country or zone should be carried out and has not detected any evidence of infection. Measures to prevent spread of the infection from the containment zone to the rest of the country or zone, including ongoing surveillance in the containment zone, should be in place.

The free status of the areas outside the containment zone would be suspended pending the establishment of the containment zone. The suspension of free status of these areas could be lifted, once the containment zone is clearly established, irrespective of the provisions of the disease specific chapter.

Comment – Is there inconsistency because the first paragraph requires the standstill of movement of “all” animals and commodities while the second paragraph only considers “susceptible” animals?

It appears that the sentence “Increased passive and targeted surveillance in accordance with Appendix 3.8.7. in the rest of the country or zone should be carried out and has not detected any evidence of infection” should be in the 3rd paragraph that addresses the rest of the country instead of the second paragraph that addresses the containment zone.

GENERAL GUIDELINES FOR ON THE APPLICATION OF COMPARTMENTALISATION –APPENDIX 3.X.X., ARTICLE 3.X.X.7.

Emergency response and notification

Early detection, diagnosis and notification of *disease* are critical to minimise the consequences of *outbreaks*.

In case of a suspicion or an occurrence of any OIE listed disease not present according to the baseline animal health report of the compartment referred to in article Article 3.x.x.4., the management of the compartment should notify the Veterinary Administration Authority, as this may indicate a breach in the biosecurity measures. The Veterinary Administration Authority should immediately suspend export certification and should notify the importing countries re-assess the biosecurity of the compartment and if a significant breach is detected, export certification should be suspended. Trade may only be resumed after the compartment has adopted the necessary measures to re-establish the biosecurity level and the Veterinary Administration Authority re-approves the compartment for trade.

In the event of suspicion of occurrence of the disease for which the compartment was defined, export certification should be immediately suspended. If confirmed, the status of the compartment should be immediately revoked and importing countries should be notified following the provisions of Chapter 1.1.2.

Comment – In the second paragraph, when there is an occurrence of an OIE listed disease, the Veterinary Authority does not immediately suspend exports but instead reassesses biosecurity first. However, in the third paragraph, when there is only suspicion of occurrence, exports are immediately suspended. Is this inconsistency justified?

NEWCASTLE DISEASE – CHAPTER 2.7.13

ARTICLE 2.7.13.4514.

When importing from an ND free country, *zone* or *compartment* as defined in Article 2.7.13.3., *Veterinary Administrations Authorities* should require:

for fresh meat of poultry

the presentation of an *international veterinary certificate* attesting that the entire consignment of *fresh meat* comes from birds:

1. which have been kept and slaughtered in an ND free country, *zone* or *compartment* since they were hatched or for at least the past 21 days;
2. which have been slaughtered in an *approved abattoir* and have been subjected to **ante-mortem and post-mortem inspections in accordance with Appendix 3.10.1.** and have been found free of any sign suggestive of ND.

ARTICLE 2.7.13.16.

~~When importing from a country, zone or compartment not considered free from ND. Regardless of the ND status of the country, zone or compartment of origin, Veterinary Administrations Authorities should require:~~

~~for meat products of poultry~~

the presentation of an *international veterinary certificate* attesting that:

1. the entire consignment of meat comes from animals which have been slaughtered in an *approved abattoir* and have been subjected to ante-mortem and post-mortem inspections and have been found free of any signs suggestive of ND;

Comment - Article 2.7.13.4514. requires ante-mortem and post-mortem inspections to be conducted in accordance with Appendix 3.10.1. However, article 2.7.13.16 does not have the same qualification. The qualification should be added for consistency.

GUIDELINES FOR THE TRANSPORT OF ANIMALS BY SEA – APPENDIX 3.7.2

ARTICLE 3.7.2.7.

Pre-journey period

1. General considerations

- a) <Snip>

- b) In some circumstances, animals may require pre-journey assembly. In these circumstances, the following points should be considered:

- i) <Snip>

- ii) For animals such as pigs which are susceptible to motion sickness, and in order to reduce urine and faeces production during the journey, a species-specific short period of feed deprivation prior to loading is desirable.

Comment – As modified, the sentence in Article 3.7.2.7.1.b).ii) is incomplete.

GUIDELINES FOR THE TRANSPORT OF ANIMALS BY LAND – APPENDIX 3.7.3

ARTICLE 3.7.3.5.

Planning the journey

1. <Snip>

2. Preparation of animals for the journey

- a) When animals are to be provided with a novel diet or method of water provision during transport, an adequate period of adaptation should be planned. For all animals it is extra important that the rest stops during long journeys are long enough to fulfil the needs of the animals of feed and water. Species-specific short period of feed deprivation prior to loading may be desirable.

Comment – The added sentence that addresses rest stops DURING a journey appears to be inappropriately placed in a paragraph addressing PREPARATION for the journey. In addition, ‘fulfill’ is misspelled. The added sentence

appears to be consistent with the points addressed by Article 3.7.3.5.7.b); therefore, this statement should either be deleted or moved to this more appropriate section of the guidelines.

GUIDELINES FOR THE KILLING OF ANIMALS FOR DISEASE CONTROL PURPOSES – APPENDIX 3.7.6

ARTICLE 3.7.6.17.

Cervical dislocation and decapitation

1. Cervical dislocation (manual and mechanical)

a) Introduction

Unconscious poultry may be killed by either manual cervical dislocation (stretching) or mechanical neck crushing with a pair of pliers. Both methods result in death from cerebral anoxia due to cessation of breathing and/or blood supply to the brain.

However, conscious birds of less than 3 kilograms in case of small numbers of birds where other methods are not available or impracticable, may be killed using cervical dislocation in a way that the blood vessels of the neck are severed and death is instantaneous.

Comment – It appears there is no need for the qualifier “however.” In addition, we believe clarity would be improved by the following revisions to the added statement: “When the number of birds to be killed is small, and other methods of killing are not available or are impracticable, ~~However,~~ conscious birds of less than 3 kilograms ~~in case of small numbers of birds where other methods are not available or impracticable,~~ may be killed using cervical dislocation in a way that the blood vessels of the neck are severed and death is instantaneous.”

ARTICLE 3.7.6.18.

Pithing and bleeding

1. Pithing

<Snip>

2. Bleeding

a) Introduction

Bleeding is a method of *killing* animals through the severance of the major blood vessels in the neck or chest that results in a rapid fall in blood pressure, leading to cerebral ischaemia and death.

Bleeding out should be completed and any incision made should ensure the complete severance off both carotid arteries, or the vessels from which they arise (e.g. chest stick).

Comment – The phrase “Bleeding out should be completed and” should be deleted and “off” should be revised to “of.”

DRAFT GUIDELINES ON DOG POPULATION CONTROL

ARTICLE 4

3. Legislation

Legislation that would help authorities establish ~~to establishing~~ successful dog control programmes should include the following key elements:

a) registration and identification of dogs and licensing of dog breeders ~~owners~~;

<Snip>

g) regulations on the breeding and sale of dogs ~~Commercial dog production~~;

<Snip>

- i) dog shelters;

<Snip>

Comment – If all sources of dogs are to be accounted for and managed appropriately (including ensuring adherence to humane animal care standards), then it seems prudent to consider regulating the acquisition, production, and release of dogs from not only dog breeders, but also shelters and rescue groups. Breeders have been accounted for in the current language, but not shelters or rescue groups; therefore additional language should be added to point i) indicating that such shelters/rescue groups might also be licensed.

ARTICLE 5 Control measures

<Snip>

1. Education and ~~promotion~~ legislation of for responsible ownership (To be completed)

<Snip>

The owned dog population is a primary source of stray dogs, through the abandonment of unwanted dogs and their offspring, and through allowing owned dogs to roam unrestricted, contributing to the stray population. Encouraging dog owners to be more responsible will reduce the number of dogs allowed to roam, improve the health and welfare of dogs, and minimise the risk that dogs post to the community. The promotion of responsible dog ownership through legislation and education is a necessary part of a dog population management programme. Collaboration with responsible animal welfare NGOs and private veterinarians will assist *Veterinary Authorities* in establishing and maintaining programmes.

Comment – OIE documents should acknowledge the value that not only animal welfare NGOs, but also dog fancy NGOs (e.g., kennel clubs, performance sport organizations) and veterinary organizations bring to the table when it comes to education regarding responsible dog ownership. The added text should be amended to: “Collaboration with responsible animal welfare NGOs, dog fancy NGOs, and private veterinarians, and veterinary organizations will assist *Veterinary Authorities* in establishing and maintaining programmes.”

<Snip>

5. Management of dogs removed from communities

<Snip>

Dogs that are removed from a community may in some cases be provided health care (including rabies vaccination), sterilised, and released to their local community at or near the place of capture. who agree to take responsibility for the health, welfare and management of the animal. The beneficial effect of this practice for dog welfare and population management is unknown. With regard to disease control, such as for rabies and possibly others, some beneficial effect may be realized. This may be short or long time. This method is more likely to be accepted in the situation where the presence of stray dogs is considered to be inevitable and is well tolerated by the local community.

This method is not applicable in all situations and may be illegal in countries where legislation prohibits the abandonment of dogs. Problems caused by dogs, such as noise, faecal pollution and traffic accidents, would not be alleviated as dogs are returned to the local community and their movements are not restricted. If the local community has owned dogs, consideration should be given to the potential encouragement of abandonment of

unwanted. In the situation where many dogs are owned, a population control programme that focuses on neutering and responsible ownership may be more appropriate.

Comment – The sentence “If the local community has owned dogs, consideration should be given to the potential encouragement of abandonment of unwanted.” is incomplete.

<Snip>

Dogs that are removed from a community may, ~~in some cases,~~ be too numerous or may be unsuitable to place responsible ownership. ~~If elimination of the excess animals is the only option; killing should be under regulation by a for any rehoming scheme.~~ If euthanasia of these unwanted animals is the only option, the procedure should be conducted in accordance with the regulations of the *Competent Authority* and conducted humanely (see Article 4.k).

Comment – The word “responsible” should be deleted from the first sentence of the preceding paragraph: “Dogs that are removed from a community may be too numerous or may be unsuitable for any rehoming scheme.”

<Snip>

9. Regulation of commercial ~~Animal~~ dog dealers

<Snip>

Regulation is needed to ensure that dog breeders and dealers are identified by the *Competent Authority* and are committed to raising and selling physically and psychologically healthy animals, as unhealthy animals may be more likely to be abandoned to become part of the stray population. Regulations should include specific requirements for accommodation, provision of suitable food, drink, and bedding, adequate exercise, veterinary care and *disease* control. Breeders and dealers establishments should be inspected at regular intervals, including veterinary inspections. Advice on proper animal care should be given to all new owners of dogs.

Comment – For a dog control program to be truly comprehensive, any proposed regulatory authority must also ensure that animal shelters and rescue groups (in addition to dog breeders and dealers) are identified by the *Competent Authority* and are committed to release physically and psychologically healthy animals to new owners. In addition (and as already indicated in the document) flexibility in adaptation of a dog population control program to the needs of the community and stakeholder base is important; this implies “regulatory authority” as compared with “regulation.” Retention of the “commercial” qualifier in the title for this section is also not consistent with its removal in previous sections of the document (see, for example, Article 4.3.g.). We therefore suggest the title of this section be amended as: “Regulation of commercial dog dealers, breeders, and shelters and that the first sentence of the identified paragraph be amended to: “Regulatory authority ~~Regulation~~ is needed to ensure that dog breeders, ~~and~~ dealers, and shelters are identified by the *Competent Authority* and are committed to raising, ~~and~~ selling, and rehoming physically and psychologically healthy animals...”

10. Reduction in dog bite incidents

<Snip>

“...Dog owners should be educated ~~trained~~ in principles of responsible pet ownership as described in Article 5a.”

Comment – In the revised version of the document, Article 5a does not exist. We believe the appropriate reference is to Article 5.1?

11. Euthanasia

<Snip>

Table 1 – Gaseous methods

Comment – Although there were no indications of revised text, and comments were not specifically invited, we noted an apparent contradiction in Table 1 for the carbon monoxide entry. The column on animal welfare concerns/implications indicates “Gas is aversive.” The column on advantages indicates “No odour (therefore no aversive effect).” This discrepancy needs to be rectified to avoid confusion.

<Snip>

- a) Summary assessment of Comments on methods for the euthanasia of dogs

<Snip>

- v) Carcass disposal

Carcasses should be disposed of in a manner that complies with legislation. Attention must be paid to the risk of residues occurring in the carcass. Incineration is generally the safest way of carcass disposal.

Comment – While we understand that both spellings are used, the spelling of “carcass” should be consistent within the text.

We have also reviewed the proposed amendments resulting from the October 2007 meeting of the Aquatic Animal Health Standards Commission and provide the following comments.

GUIDELINES ON THE HANDLING AND DISPOSAL OF CARCASSES AND WASTES OF AQUATIC ANIMALS CHAPTER X.X.X.

Comment – This chapter would be an excellent addition to the Code provided it is extensively rewritten and restricted to the handling and disposal of (high-risk) aquatic animals, offal, and other products that were known or suspected to be infected with OIE listed, or other priority diseases.

In its current form:

- The Introduction and other Articles that discuss low-risk waste imply that many of the requirements might also apply to current seafood processing establishments;
- Many of the definitions appear to be redefining already well understood English terms, or are ambiguous or confusing and should be rewritten (e.g., an animal “carcass” is not simply its body/trunk; a “container” is not simply a transport appliance; “composting” can be aerobic and/or anaerobic depending on the desired organic product; “slaughter/ harvest/ killing/ culling” have limited relationships to transporting animals; “disposal” appears to be describe pathogen inactivation; “ensiling” and “rendering” are usually terms associated with producing animal feed, etc).
- A significant portion of the chapter focuses on “disposal plants” intended for exclusively disposing of infected carcasses and wastes. While a good concept, we are not aware that such facilities exist and readers may assume that dedicated “disposal plants” may have to be constructed. It is preferable and more practical to address pathogen inactivation and carcass/waste dispose for each of the different methods mentioned – composting, ensiling, burying, incineration, pyres, cremation, rendering, digestion, sterilization, biogas production (?), mounding (?), fermenting (?), pasteurization (?), using landfills (public garbage disposal?), etc. It would be useful to establish suitable guidelines for facilities that may already (or may want to) utilize one or more of these methods.

INTRODUCTION TO OIE GUIDELINES FOR THE WELFARE OF LIVE AQUATIC ANIMALS ARTICLE X.X.X.1.

Guiding principles for aquatic animal welfare

5. That the internationally recognized ‘five freedoms’ (freedom from hunger, thirst and malnutrition; freedom from fear and distress; freedom from physical and thermal discomfort; freedom from pain, injury and disease; and freedom to express normal patterns of behavior) provide valuable guidance in *aquatic animal* welfare.

Comment – As indicated in our August 2006 response to a similar document, we recognize that the ‘five freedoms’ can serve as a useful tool when assessing the welfare of animals (including aquatic animals); however, they were developed with terrestrial animals in mind and their application to aquatic animals is not straightforward. As noted previously, data regarding pain, stress and distress, cognition, perception, and emotion in aquatic animals are currently limited and ambiguous. With respect to fear and distress specifically, nociception and avoidance behavior are not confirmation of an emotional response, although each has been used to support the existence of same. Although fear and distress in aquatic animals may currently be difficult to assess, we are comfortable there is an established relationship between chronic stress and health. Furthermore, it is unlikely that aquatic animals that are constantly immersed in water and that can maintain hydration through their gills will experience ‘thirst.’

We therefore suggest the following alternate language may be more suitable for aquatic animals at the present time: That the following adaptation of the ‘five freedoms’ for aquatic animals may provide valuable guidance in assessing their welfare:

- ◆ freedom to express normal patterns of behavior;
- ◆ freedom from injury and disease;
- ◆ freedom from chronic, long-term stress;
- ◆ freedom to occupy optimal osmotic, physiochemical, and thermal conditions; and
- ◆ freedom from malnutrition.

We appreciate the opportunity to provide input.

Sincerely,



Lyle P. Vogel, DVM, MPH
Assistant Executive Vice President

LPV/GCG/DS