(別添 4)

Japan's comments on country status for Bovine Spongiform Encephalopathy

Government of Japan(GOJ) highly appreciates that both the OIE Scientific Commission for Animal Diseases and the *Ad Hoc* Group on Bovine Spongiform Encephalopathy Risk Status Evaluation of Members have made great efforts on reviewing country dossiers submitted by OIE member including Japan and on making recommendations for BSE risk status of each applicant.

We submit the following comments bearing in mind that the BSE risk status needs to be determined based on the risks on both animal and human health.

1. Review of new country status applications for BSE risk

1.1 Colombia

GOJ supports the recommendation made by the *Ad Hoc* Group to consider exclusion of SRM from the feed chain

1.2 Japan

We appreciate the BSE risk status of Japan was evaluated to be "controlled". However, we would like to note the followings in regard to the comments from the *Ad Hoc* group:

a) In relation to the risk of recycling and amplification of the BSE agent, the *Ad Hoc* group mentioned "Since 2001 SRM have been removed and incinerated. Since 2001 MBM has been banned for ruminant feed and ruminant MBM has been banned for all animal feed. Since 2005 there has been 100% separation of feed mills into those producing ruminant feed and those producing feed for other animals." Nevertheless, the *Ad Hoc* group concluded that the risk of recycling and amplification of the BSE agent is not negligible. We seek clarification for this conclusion.

b) In the conclusion section, the *Ad Hoc* group commented in relation to the absence of clinical suspects in Japan' BSE surveillance that Japan might have denied the accumulation of BSE surveillance points as a result of the current definition of clinical suspects. We note that we have no intention of denying accumulation of BSE surveillance points in accordance with the Terrestrial Code and that the absence was due to our current definition of clinical suspect which is more stringent than that of OIE and thus resulting

in screening-out of all potential clinical suspects. In addition, we reinstate that clinical suspects in Japan which are required to be tested are properly subject to the BSE test through either BSE testing at slaughterhouses or obligatory BSE monitoring at farm level.
c) In the risk assessment for introduction of the BSE agent, the result of the latest investigation showed that the MBM for human consumption was never imported to Japan, although the Ad Hoc group commented that “Small Amounts of MBM were imported from EU countries and the USA for human consumption and industrial use”. On the other hand, the cooked and dried beef product for human food (25kg) was imported from US once in 2003 before the occurrence of first BSE case.

2. Annual updates on the recognised BSE risk status of the members of OIE previously assessed
We note that the *Ad Hoc* group pointed out that annual updates on the previously recognised BSE risk status have not been properly followed and in addition, there has been considerable variation among annual updates submitted. We urge OIE to improve the form of annual updates on previously recognised BSE risk status so that annual update by the OIE members previously assessed can be facilitated. We also urge OIE to encourage all members previously assessed to submit annual update without delay.