

EUROPEAN UNION

Brussels  
SANCO G2/MMK/kh (2013) 161690



**Subject: Additional EU comments on the report of the September 2012 Code Commission meeting**

Dear Director General,

Referring to the EU comments sent to you on 19 December 2012, please find attached additional comments of the European Union (EU) on the report of the September 2012 meeting of the Terrestrial Animal Health Standards Commission as regards the report of the *ad hoc* group on Notification of Animal Diseases and Pathogenic Agents, for consideration in the next OIE Code Commission meeting of February 2013.

We trust you will find this useful and we thank you for your continued cooperation.

Yours sincerely,

<p>Dr. Martin Blake Chief Veterinary Officer and OIE Delegate Ireland</p>	<p>Dr. Bernard Van Goethem Director Veterinary and International affairs DG Health and Consumers European Commission</p>
	

Annex: 1

Copy: All Directors / Chief Veterinary Officers of the EU 27 and Croatia, Iceland, Liechtenstein, Norway, Switzerland and Turkey.

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## Additional EU comments

Referring to the EU comments of 19 December 2012 on the report of the OIE Code Commission (Annex VII) relating to the delisting of EBL and paratuberculosis, as suggested by the Ad Hoc Group on notification of animal diseases and pathogenic agents, the EU would like to make the following additional comments in light of the fact that the new criteria for listing are applied for the first time:

1. As regards EBL, at least 21 OIE Members<sup>1</sup> have declared themselves free of the disease and four OIE Members<sup>2</sup> have declared regions that are free. This considerable number of free countries is not reflected in the report of the meeting of the OIE Ad Hoc Group on Notification of Animal Diseases and Pathogenic agents of 24-26 July 2012, which mentions only New Caledonia and Iceland as pending or free countries in the table on page 19.
2. Furthermore, there seems to be a discrepancy between the table on page 19 and the text on page 4 of the report of the meeting of the OIE Ad Hoc Group on Notification of Animal Diseases and Pathogenic agents of 24-26 July 2012 as to whether the morbidity of EBL is significant or not (in the table, it says YES, whereas in the text it says NO).
3. According to the Merck Veterinary Manual, despite the fact that most bovine leucosis virus (BLV) infections are asymptomatic, approximately 30% of infected cattle develop persistent lymphocytosis, and this response to infection is not associated with clinical sign of disease. The development of leucosis is a rare manifestation of BLV infection. The incidence of tumour cases varies considerably from herd to herd; the average annual rate in infected cattle is estimated to be 0.3%. In other words, although prevalence of clinical disease is low, the prevalence of subclinical infections tends to be high. In addition, several reports do indicate association between subclinical infection and production losses<sup>3, 4, 5, 6</sup>. Therefore, the EU would like to ask the OIE to clarify whether significant production losses in the absence of clinical signs should not be regarded as meeting the criterion of "significant morbidity."
4. In this context, the EU would like to ask the OIE whether any new data are available to explain the fact that EBL was previously listed based on the fact of significant morbidity, while it is now suggested to delist this disease based on the fact that it does not meet this same criterion (the wording of which has not changed from the previous version).
5. Whilst the EU acknowledges that paratuberculosis would not meet the listing criterion of reliable means of detection and diagnosis at the level of an individual animal, such diagnostic tests do exist at herd level. This has led some EU Member States to opt for control programs.
6. For the reasons mentioned above, the EU emphasises the need for particular caution in proposing to delist these two diseases and has to reserve, at this stage, its final position.

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<sup>1</sup> Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Germany, Spain, Finland, France, Ireland, Latvia, Lithuania, Luxembourg, Netherlands, Norway Slovakia, Slovenia, Sweden, Switzerland and UK

<sup>2</sup> Italy, Poland, Portugal and UK (Isle of Man)

<sup>3</sup> Sargeant *et al.* (1997). "Associations between farm management practices, productivity, and bovine leukemia virus infection in Ontario dairy herds." *Preventive Veterinary Medicine* 31 (1997), 211-221.

<sup>4</sup> Erskine *et al.* (2012). "Association between bovine leukemia virus, production and population age in Michigan dairy herds." *Journal of Dairy Science* Vol. 95 (No. 2): 727-734.

<sup>5</sup> Rhodes *et al.* (2003). "Economic implications of bovine leukemia virus infection in mid-Atlantic dairy herds." *Journal of the American Veterinary Medical Association* 223 (3): 346-352.

<sup>6</sup> Chi *et al.* (2002). "Direct Production Losses and Treatment Costs from bovine viral diarrhoea virus, bovine leukosis virus, *Mycobacterium avium* subspecies paratuberculosis, and *Neospora caninum*." *Preventive Veterinary Medicine* 55 (2002), 137-153.