

ANNEX 2

EU COMMENTS ON THE DRAFT OIE SIXTH STRATEGIC PLAN 2016-2020

The EU congratulates the OIE for the continuous and successful implementation of its Fifth Strategic Plan since 2011 and for the permanent communication with its Members during this period and in the drafting of its Sixth Strategic Plan. The EU welcomes the opportunity to provide comments and in general supports the draft Strategic Plan submitted for Member comments in April 2014, in particular the new succinct format proposed. The following initial comments are provided for consideration by the OIE in the further elaboration of the Strategic Plan.

1. General and prefatory comments

1.1. The EU welcomes the new succinct format proposed for the Sixth Strategic Plan. As becomes clear from the wording in some of the sections (e.g. “In this regard, it is proposed that the Sixth Strategic Plan provides for the following:” on p. 5), this text merely represents a preparatory document. Nevertheless, the EU expects that this new format will be retained in the first draft of the Sixth Strategic Plan.

1.2. As regards the description of the strategic objectives, the EU suggests a higher level of consistency for the structure of the text detailing the individual objectives, including as regards the arrangement of text blocks and lists of bullet points. Indeed, the listing of “issues to be addressed” and “activities under this objective” respectively could uniformly be provided at the end of each respective section of the individual objectives. The same holds true for the sections on the cross-cutting areas of activity. Detailed action plans should be elaborated in the form of annual work programmes of the Director-General reflecting the objectives and the cross-cutting areas of the Strategic Plan.

1.3. The draft document seems to aim to be as inclusive as possible of the themes currently discussed in the veterinary profession. In order to improve clarity, if such a comprehensive approach is kept, consistency should be aimed at as to the level of detail provided for individual topics. Indeed, the important subject of bioterrorism for instance is only mentioned as a keyword, without any further indication of what this topic would encompass in the context of the OIE. Furthermore, consistency should be sought as regards the grouping of the activities proposed in the different domains of animal health, animal welfare, capacity of veterinary services and veterinary public health.

1.4. In general, the EU would suggest defining indicators and targets for all strategic objectives described, in order to allow measuring the impact of the individual activities proposed.

2. Towards OIE 2020

2.1. The EU welcomes this section of the Strategic Plan and suggests making the introductory sentence stronger and clearer. Indeed, some important elements seem to be missing, particularly OIE’s internationally accepted role and its globally recognised standard setting role. A specific text proposal is included in section 10.

2.2. Furthermore, at the end of the first paragraph, the EU suggests capturing the contribution of the veterinary public health role of veterinary services, as set out in section 6 of the OIE *Terrestrial and Aquatic Code*, to enhancing human health in line with the “One Health” concept. A specific text proposal to this effect is included in section 10.

3. OIE’s Global Vision and Strategic Objectives

3.1. The EU supports OIE’s global vision and the new motto of “Protecting animals; preserving our future”, and would suggest expanding the first paragraph of this section of the Strategic Plan to better convey the background of this global vision in a few more lines.

4. Strategic objective 1: Securing animal health and welfare by appropriate risk management

4.1. As regards the outputs described in relation to zoonoses in the first paragraph of this section (“*reduction in the occurrence of diseases transmitted between animals and humans*”), the EU suggests further expanding the text to clearly set out two aspects of this point: reduced direct transmission between animals and humans, and also through the food chain. A specific text proposal to this effect is included in section 10.

4.2. Moreover, a further output could be included in the first paragraph of this section, i.e. improved or enhanced animal welfare. Animal welfare could also be mentioned in the list of “particular issues to be addressed”.

4.3. The EU suggests adding a specific reference to bee health, for instance in the first bullet point of this section, after the reference to aquatic animals.

4.4. The EU reiterates its strong support for the scientific process established in the OIE *Terrestrial Code* as regards the OIE official disease status recognition procedure, involving the expertise of the elected OIE Scientific Commission and *ad hoc* Group members. The EU wishes for this system to be maintained, and if necessary, reinforced as regards human and budget resources, taking into account the increased work load in this regard due to the addition of several diseases in recent years (AHS; PPR; CSF), as well as the endorsement of official national control programmes (FMD; PPR; CBPP). Consequently, the EU is of the opinion that at this stage, priority should be given to the consolidation of the procedure, making best use of available resources and ensuring the quality of the procedure, and that further diseases should only be added after very careful consideration.

4.5. In this regard, the EU invites the OIE to consider elaborating criteria for adding diseases to the list of diseases with official disease status recognition and endorsement of official control programmes. Such criteria could include significant or frequent differences among member countries in relation to international trade, and the existence of a global control strategy for a given disease. In consequence, and since establishment and recognition of reasonable and proportionate international standards is crucial to allowing safe trade to happen, only diseases that the majority of Members view as a risk, supported by evidence, should be considered for official disease status recognition by the OIE. As OIE Members do not request official disease status recognition for the same range of diseases, a collective understanding and agreement about a core group of diseases which everyone agrees need to be covered should be sought.

4.6. As regards the criteria for listing diseases by the OIE and the concept of emerging diseases, for which notification by Members to the OIE is mandatory, the EU calls upon the OIE to exercise utmost care in the upcoming further review of existing rules, which were only recently revised. Indeed, the current new listing criteria have been applied diligently, and the adjustments that have proven necessary along the way should be reflected carefully. In particular, while developing the system further, a balance should be achieved between the legitimate calls for clarity of the criteria and the necessary flexibility to take into account diverse situations and future developments. The OIE should aim to achieve this important task within the next 4 years, and the EU is ready to provide technical support to the OIE in this regard.

4.7. The EU welcomes the perspective of improving the OIE standard-setting process by fostering engagement of all Members and by improving the involvement of stakeholders. This will necessitate improving the transparency and inclusiveness of procedures, including making reports of Specialist Commissions and all draft standards available on the public OIE website from an early stage, as well as formalising the consultation of stakeholders such as international and regional public and private organisations with mutual interests in the areas covered by OIE standards. At the same time, the OIE should allow sufficient time for Members to reflect and comment on proposed amendments to OIE standards, and to consult stakeholders at national and regional level, before amendments to existing, or new standards, are submitted for adoption by the World Assembly; this is a crucial element of OIE standard setting and should remain an integral part of the democratic procedure of elaborating and adopting OIE standards, which regrettably was not always adhered to in recent years.

4.8. The EU recognises that uncertainties still prevail among OIE Members as regards the differences between OIE “standards”, “guidelines” and “recommendations”, especially as regards the obligations they impose on Members, including their binding nature in the context of international trade and WTO membership. These distinctions (binding standards with recommendations for trade in animals and their products on the one hand; non-binding guidelines on the other hand, which are still relevant to the assessment of countries’ animal health capability and thus ability to certify in accordance with standards) should be worked out in a clear way that is acceptable to all OIE Members in the course of the next Strategic Plan. One way to achieve this could be a study undertaken by the OIE in collaboration with the WTO.

4.9. The EU welcomes the reference to “One Health” and the mentioning of “effective and judicious management of the use of antimicrobial substances” in this section and encourages the OIE to expand further on these very important topics. Indeed, the EU particularly suggests an explicit reference to prudent use of antimicrobial agents, a topic that is crucial to control the ever increasing problem of antimicrobial resistance, both in the areas of animal health and public health. In this respect, close collaboration and coordination with partner organisations such as WHO and Codex Alimentarius Commission are the keys to success and should be mentioned in this section as well.

4.10. Regarding the global increase of proprietary technologies developed commercially, while welcoming this economically important development, the EU is of the opinion that in particular the use of certain modern diagnostic techniques for pathogen surveillance should

not be hampered by these commercial developments. Sequences and pathogens should therefore always be made publicly available for diagnostic and scientific purposes, and the OIE should advocate this proactively in the interest of public good.

5. Strategic objective 2: Establishing trust through communication

5.1. The EU welcomes the announcement by the OIE to modernise the World Animal Health Information System (WAHIS), including as regards the interconnectivity with regional / national databases, and will gladly participate with its experts and is ready to support the OIE in this important endeavour. It will however be crucial to initially have a deep reflection with OIE Members on what is to be achieved by thoroughly revising WAHIS, both in terms of the notification process and contents, and as regards communication with members of WAHIS and users of the World Animal Health Information Database (WAHID). In particular, the highest priority should be for the system to closely mirror the requirements of the *Terrestrial and Aquatic Code*, especially the definition of disease and the species concerned, including wild life, in the disease specific chapters, and ensuing differentiated notification obligations. Indeed, the data resulting from mandatory notification of listed diseases should be clearly differentiated in the system and in any communication tool used by the OIE from other information provided by members on a voluntary basis, especially as regards listed diseases in (wild) species not included in the respective disease definition of the *Codes*, and as regards non-listed diseases in wild (or domestic) species. Furthermore, the system should be flexible enough to be able to accommodate the yearly amendments of the *Terrestrial and Aquatic Codes*.

5.2. Since communication is a two-way process, and the focus of this section of the Strategic Plan is very much on “outward communication” from the organisation, reflection and commentary on the “listening” aspect of communication by the organisation would be merited.

6. Strategic objective 3: Ensuring the Capacity and Sustainability of Veterinary Services

6.1. The EU welcomes the important and increasing work of the OIE to support its Members in sustainably developing the capacity and good governance of their veterinary services with a view to better implement OIE standards. Therefore, the EU fully supports the foreseen further development of these activities by the OIE, including as regards veterinary education and veterinary statutory bodies, which is especially of benefit for the many developing and in transition countries that are Members of the OIE and who specifically call upon support from the OIE in this regard. At the same time, the EU is of the opinion that the OIE PVS pathway, while being of great benefit for the many OIE Members that wish to make use of it, should always remain a completely voluntary tool. The voluntary nature of the PVS pathway should consequently be made explicit in all OIE communications, including the Sixth Strategic Plan.

6.2. As the OIE standards which are to be implemented by the veterinary services of OIE Members go beyond animal health and welfare, and encompass veterinary public health including animal production food safety and zoonoses, the EU suggests explicitly mentioning veterinary public health and zoonoses in the introductory paragraph of this section. This would be in line with sections 6 of the *Terrestrial and Aquatic Code*.

6.3. The EU is of the opinion that the correct implementation of OIE standards and the recognition of official OIE disease status of countries should be improved by all OIE Members. The role and the capacity of the OIE in supporting its Members to implement and respect OIE standards, including in their bilateral trade relations, should be enhanced in this respect. For instance, the role of the OIE in the mediation of disputes between trading partners should be improved and could be expanded. For instance, the expert opinion of the OIE could be sought more often when the correct interpretation of OIE standards is contended.

6.4. Furthermore, principles for discussing risks and their mitigation in the context of bilateral or multilateral trade should be sought for those diseases for which there is no official OIE status recognition. For these diseases, an agreed transparent set of principles/a framework could be developed which Members could use in bilateral/multilateral/trading bloc negotiations. It would be useful to establish an advice or referral process in the OIE that could review the agreed risk mitigation measures that are implemented to allow trade and provide an objective assessment of the remaining risks. The existing OIE epidemiology reference centres could actively be involved in this process. If this works properly, this would create more flexibility when having meaningful discussions about proportionate and cost effective ways of supporting safe trading.

6.5. A further main component could be added to this third strategic objective, i.e. "To support members by developing and promoting the most cost-efficient and sustainable means of achieving animal health and welfare outcomes". It should focus on the animal health and welfare outcomes to be achieved from surveillance and interventions by encouraging recognition of equivalence rather than prescribing detailed requirements or processes. This would aid in promoting capacity building and support sustainability of veterinary services. Developing OIE standards should therefore, as well as being timely, current and scientifically based, provide where possible for equivalence of outcome while being adaptable for different situations.

6.6. Furthermore, the EU suggests mentioning the global FMD control initiative more explicitly in the Sixth Strategic Plan, since it is such a flagship project and an excellent tool to improve the overall governance of veterinary services. Indeed, setting out the focussed FMD objectives and the wider disease control and capability benefits would be beneficial in this respect, as well as describing the FAO/OIE GF-TADs mechanism, making the link to the overall strategic objectives.

6.7. The EU suggests further consideration of a continuing reactive role for the OIE in response to disease outbreaks and to cover this in the Strategic Plan, explaining the rationale for intervention, how such intervention will be funded, and whether the OIE will ever act on its own or only in partnership with others, e.g. the FAO, in the context of GF-TADs. The current draft does mention OIE leading in this area, but only separately talks about working in partnership with other international organisations.

7. Cross-cutting area A: Scientific excellence

7.1. The EU supports the independent evaluation of existing OIE Reference Centres (Reference Laboratories and Collaborating Centres), as indeed there is a need to secure scientific excellence and leadership of OIE Reference Centres in a sustainable way over the

years. A further instrument to achieve this would be to appoint Reference Centres for a certain fixed term (5 or 10 years), with a possibility to renew the appointment subject to meeting clear conditions.

7.2. Furthermore, every effort should be made to ensure a more even geographic distribution of Reference Centres, not only across the world, but also within individual Regions. Indeed, there seems to be a clustering of reference Centres not only in certain regions, but also in individual OIE Members.

8. Cross-cutting area B: Diversity, inclusiveness, engagement, transparency

8.1. The EU suggests expanding on the concepts of the keywords mentioned in the title of this section, as the readability of the text would benefit from some clarifications.

8.2. Furthermore, this section should be reviewed with a view to avoiding overlaps and redundancy with the next section on governance. Indeed, the three first bullet points with proposals for the Sixth Strategic Plan would seem better placed under the cross-cutting area C as they relate to governance of OIE bodies.

8.3. As already stated in comment 4.7., the EU welcomes the prospect of reviewing the OIE standard setting process, particularly by further improving their transparency and the inclusiveness of the process also for non-members. The EU will be glad to offer technical support to the OIE also in this respect and to share its longstanding experience in this important area of governance.

9. Cross-cutting area C: Governance

9.1. The EU is of the opinion that it would be helpful if the Strategic Plan set out how the various elements of the strategy are funded. For example, standards, guidelines and global disease information are a central function funded from statutory contributions of Members, whilst capacity building and disease control initiatives are enabled by additional voluntary funding from donors, via the OIE World Animal Health and Welfare Fund. While this is mentioned in certain sections of the draft Strategic Plan (e.g. in the section on capacity of veterinary services), it would be preferable to have a much clearer statement in the "Resource Planning and Accounting" section (p. 6).

9.2. As raised by several OIE Members during the recent OIE General Session, the workload of the Specialist Commissions is ever increasing. This is especially true for the Aquatic Animals Commission, which is the sole OIE body responsible for both the *Aquatic Code* and the *Aquatic Manual*. In light of the growing body of scientific knowledge of Aquatic animal diseases and the exponential growth of global aquaculture production, the EU supports the suggestion of specifically supporting the Aquatic Animals Commission by establishing a permanent Working Group on Aquatic Animal Diseases or, depending on the preference and the specific needs of the Aquatic Animals Commission, by other suitable means of support.

9.3. The EU fully supports and encourages the further collaboration between the OIE and other international and regional organisations with mutual interests in the areas covered by the OIE. Systematic coordination and collaboration on cross-cutting subjects with organisations such as FAO, WHO, WTO, Codex Alimentarius Commission, IPPC, and other relevant bodies, should be enhanced, and existing collaboration arrangements should be

deepened (e.g. GF-TADs). A true spirit of cooperation and trust among the partner organisations would be desirable in this respect.

9.4. To many OIE Members, the role of the OIE Regional Commissions is not very clear. The EU suggests that the role and duties of the Regional Commissions be analysed in depth, also in relation to the role of OIE Regional and Sub-Regional Representations. If warranted, the responsibilities of Regional Commissions should be strengthened and their activities should be increased, with the support of OIE Regional and Sub-Regional Representations, and appropriate resources, in order to give real emphasis on the regional dimension of the work of the OIE.

10. Editorial comments and specific text proposals:

10.1. In relation to the Basic Texts mentioned on p. 2, the EU suggests replacing the word “precise” by the word “clarify”, and to add “OIE” for clarity reasons as follows: “It will be necessary to clarify the OIE Basic Texts (by information notes) [...]”

10.2. The EU suggests deleting the adjective “aggressive” used in the description of resource collection and lobbying activities by the OIE (p. 4 and p. 6), as this is not an appropriate demeanour an international organisation such as the OIE should be associated with.

10.3. Furthermore, the term “Specialist Commissions” should be used throughout the text to designate the four elected Commissions SCAD, TAHSC, AAHSC and BSC, instead of “Scientific Commissions” which is sometimes used (p. 5 and 6). Likewise, the term “*ad hoc* group” should be used consistently throughout the document (several different spellings are used on p. 5 and 6).

10.4. Moreover, the EU suggests replacing the words “decision tree” by the word “criteria” in relation to the listing of diseases (p. 2), as the decision trees have recently been removed from the relevant chapter of the *Terrestrial Code*, and none are contained in the *Aquatic Code*.

10.5. Specific text proposal referred to in comment 2.1.

“The OIE is the world’s leading organisation on animal health and welfare. It has gained this recognition by providing leadership and vision, based on science, international solidarity and transparency, since its inception 90 years ago. It is an intergovernmental organisation, with global membership, responsible for improving animal health and welfare worldwide. It is recognised as a reference organisation by the World Trade Organization (WTO)”.

10.6. Specific text proposal referred to in comment 2.2.

“[...], reduced risk to human health (through implementation of veterinary public health measures, such as control of zoonoses in animals, animal production food safety controls and the prudent use of antimicrobial agents in a “One Health” approach), [...]”.

10.7. Specific text proposal referred to in comment 4.1.

“reduction in the occurrence of diseases transmitted between animals and humans (either by direct contact or through the food chain)”.