

Terrestrial Animal Health Standards Commission Report

September 2007

USA Comments

CHAPTER 2.3.3.

BOVINE TUBERCULOSIS**Comment regarding the addition of “farmed deer” to the Code Chapter on Bovine Tuberculosis:**

The United States does not support adding “farmed deer” to the Code Chapter on Bovine Tuberculosis. Instead, we recommend that a separate code chapter for “farmed deer” be developed. Many countries with a bovine tuberculosis program have separate programs for captive cervidae and domestic bovines including the recognition of different health statuses for States for the two species. Seldom are commingled herds of bovines and captive cervidae encountered. Husbandry practices, testing methodologies are different between the industries, and the physiology between the two species is also different. For example, in bovines repeat testing is conducted after in 60 days whereas in captive cervidae retesting is done after 90 days. Any TB program which combines the different species, (bovines and captive cervidae) into one classification system is not doing justice to either species.

Article 2.3.3.1.

The recommendations in this Chapter are intended to manage the human and animal health risks associated with *Mycobacterium bovis* (*M. bovis*) infection in domestic (permanently captive and owned free-range) bovines including cattle (*Bos taurus*, *B. indicus* and *B. grunniens*), water buffaloes (*Bubalus bubalis*) and wood bison (*Bison bison* and *B. bonasus*) and in farmed deer (red, wapiti, sika, samba, rusa, fallow, white-tailed, black-tailed and mule deer (*Cervus elephas*, *C. canadensis*, *C. nippon*, *C. unicolor unicolor*, *C. timorensis*, *Dama dama dama*, *Odocoileus virginianus borealis*, *Odocoileus hemionus columbianus* and *Odocoileus hemionus hemionus*).

When authorising import or transit of the following *commodities*, *Veterinary Authorities* should comply with the requirements prescribed in this Chapter relevant to the status of bovine tuberculosis in the *exporting country, zone or compartment*:

1. live animals;
2. semen, ova and *in vivo* derived embryos collected and handled in accordance with the recommendations of the International Embryo Transfer Society;
3. *meat* and *meat products*;
4. *milk* and *milk products*;

~~5. antler velvet.~~

Comment/rationale: The United States is not aware of any evidence suggesting that antler velvet is a risk for transmitting bovine tuberculosis.

Standards for diagnostic tests are described in the *Terrestrial Manual*.

Article 2.3.3.2.

Country, zone or compartment free from bovine tuberculosis

To qualify as free from bovine tuberculosis, a country, *zone* or *compartment* should satisfy the following requirements:

1. *M. bovis* infection in domestic (permanently captive and owned free-range) bovines including cattle (*Bos taurus*, *B. indicus* and *B. grunniens*), water buffalo (*Bubalus bubalis*) and wood bison (*Bison bison* and *B. bonasus*) and in farmed deer as specified in Article 2.3.3.1 is a notifiable disease in the country;
2. an on-going awareness programme should be in place to encourage reporting of all cases suggestive of clinical bovine tuberculosis;

Rationale: added the word “bovine” for clarity

3. a surveillance programme, involving regular and periodic testing of all domestic (permanently captive and owned free-range) bovines including cattle, water buffaloes, and wood bisons, cattle, water buffalo, and wood bison and farmed deer herds and capable of detecting infection at an annual period prevalence of 0.2% of herds and 0.1% of animals with 95% confidence has not detected failed to detect infection shown that at least 99.8% of the herds and 99.9% of the animals in the country, *zone* or *compartment* have been found free from bovine tuberculosis and the percentage of herds confirmed infected with *M. bovis* has not exceeded 0.1% per year for 3 consecutive years;

Rationale: suggested wording added for consistency and clarity.

4. a surveillance programme should be in place to detect bovine tuberculosis in the country, *zone* or *compartment*, through monitoring at slaughter ante-mortem and post-mortem inspection based on the inspection as described in Article Appendix 2.3.3.8: 3.10.1.;
5. if the surveillance programme described in points 3 and 4 above has not detected infection with failed to detect M. bovis for 3 consecutive years, surveillance may be maintained through monitoring at slaughter alone;

Rationale: wording as written might be misconstrued as the surveillance having failed rather than the surveillance program not detecting infection.

Recommendation to point 5: if monitoring for *M. bovis* at slaughter is the only surveillance activity being conducted, then it needs to be done at a rate sufficient to detect infection. Point 3) under this Article indicates that the surveillance program should be capable of detecting infection at an annual period prevalence of 0.2% of herds and 0.1% of animals with 95% confidence. A similar level of detection is recommended if slaughter surveillance is being used alone.

General comment to point 5: Given the insidious nature of TB and the low sensitivity of slaughter surveillance, it seems ill-advised to discontinue tuberculin skin testing after only 3 years of finding no infected animals and conducting surveillance at the level of surveillance indicated by these guidelines.

56. cattle, water buffalo ~~and~~, wood bison and farmed deer introduced into a country, *zone* or *compartment* free from bovine tuberculosis should be accompanied by a certificate from an *official Veterinarian*

attesting that they come from a country, *zone* or *compartment* or herd free from bovine tuberculosis or comply with the relevant provisions in Article 2.3.3.4. or in Article 2.3.3.5.

Article 2.3.3.3.

Herd free from bovine tuberculosis

To qualify as free from bovine tuberculosis, a herd of cattle, water buffalo, ~~or~~ wood bison or farmed deer should satisfy the following requirements:

1. the herd is in a country, *zone* or *compartment* free from bovine tuberculosis and is certified free by the *Veterinary Authority*; or
2. cattle, water buffalo ~~and~~, wood bison and farmed deer in the herd:
 - a) showed no clinical sign of bovine tuberculosis;
 - b) over 6 weeks of age, have shown a negative result to at least two tuberculin tests carried out at an interval of a minimum of 6 months, the first test being performed at 6 months following the *slaughter* of the last affected animal;
 - c) showed a negative result to an annual tuberculin test to ensure the continuing absence of bovine tuberculosis; or
 - i) showed a negative result to a tuberculin test every 2 years to ensure the continuing absence of bovine tuberculosis if the annual percentage of herds confirmed as infected with tuberculosis is not more than 1% of all herds in the country or zone during the last 2 years; or
 - ii) showed a negative result to a tuberculin test every 3 years to ensure the continuing absence of bovine tuberculosis if the annual percentage of herds confirmed as infected with tuberculosis is not more than 0.2% of all herds in the country or zone during the last 4 years; or
 - iii) showed a negative result to a tuberculin test every 4 years to ensure the continuing absence of bovine tuberculosis if the annual percentage of herds confirmed as infected with tuberculosis is not more than 0.1% of all herds in the country or zone during the last 6 years;
3. cattle, water buffalo, ~~and~~ wood bison and farmed deer introduced into the herd come from a herd free from bovine tuberculosis. This condition may be waived for animals which have been isolated and which, prior to entry into the herd, were subjected to at least two tuberculin tests carried out at a 6-month interval with negative results.

Article 2.3.3.4.

Veterinary Authorities of *importing countries* should require:

for cattle, water buffalo ~~and~~, wood bison and farmed deer for breeding or rearing

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

1. showed no clinical sign of bovine tuberculosis on the day of shipment;

2. originate from a herd free from bovine tuberculosis that is in a country, *zone* or *compartment* free from bovine tuberculosis; or
3. were subjected to the tuberculin test for bovine tuberculosis with negative results during the 30 days prior to shipment and come from a herd free from bovine tuberculosis; or
4. have been isolated and prior to entry into the herd were subjected to at least two tuberculin tests carried out at a six-month interval with negative results.

Article 2.3.3.5.

Veterinary Authorities of importing countries should require:

for cattle, water buffalo and, wood bison and farmed deer for slaughter

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

1. showed no clinical sign of bovine tuberculosis on the day of shipment;
2. originated from a herd free from bovine tuberculosis or were subjected to a tuberculin test for bovine tuberculosis with negative results during the 30 days prior to shipment;
3. were not being eliminated as part of an eradication programme against bovine tuberculosis.

Article 2.3.3.6.

Veterinary Authorities of importing countries should require:

for semen of cattle, water buffalo and, wood bison and farmed deer

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

1. the donor animals:
 - a) showed no clinical sign of bovine tuberculosis on the day of collection of the semen;
 - b) were kept in an *artificial insemination centre* free from bovine tuberculosis in a country, *zone* or *compartment* free from bovine tuberculosis and which only accepts animals from free herds in a free country, *zone* or *compartment*; or
 - c) showed negative results to tuberculin tests carried out annually and were kept in a herd free from bovine tuberculosis;
2. the semen was collected, processed and stored in conformity with the provisions of Appendix 3.2.1.

Article 2.3.3.7.

Veterinary Authorities of importing countries should require:

for embryos/ova of cattle, water buffalo and, wood bison and farmed deer

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

1. the donor females:
 - a) and all other susceptible animals in the herd of origin showed no clinical sign of bovine tuberculosis during the 24 hours prior to embryo collection;

- b) originated from a herd free from bovine tuberculosis in a country, *zone* or *compartment* free from bovine tuberculosis; or
 - c) were kept in a herd free from bovine tuberculosis, and were subjected to a tuberculin test for bovine tuberculosis with negative results during an isolation period of 30 days in the *establishment* of origin prior to departure to the collection centre;
2. the embryos/ova were collected, processed and stored in conformity with the provisions of Appendix 3.3.1., Appendix 3.3.2. or Appendix 3.3.3., as relevant.

Article 2.3.3.8.

Veterinary Authorities of importing countries should require:

for fresh meat and meat products of cattle, water buffalo and wood bison and farmed deer

the presentation of an *international veterinary certificate* attesting that the entire consignment of meat comes from animals which have been subjected to *ante-mortem* and *post-mortem* inspections as described in Appendix 3.10.1.

Article 2.3.3.9.

Veterinary Authorities of importing countries should require:

for milk and milk products of cattle, water buffalo and wood bison

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

- 1. has been derived from animals in a herd free from bovine tuberculosis; or
- 2. was subjected to pasteurization; or
- 3. was subjected to a combination of control measures with equivalent performance as described in the Codex Alimentarius Code of Hygienic Practice for Milk and Milk Products.

Article 2.3.3.10.

Veterinary Authorities of importing countries should require:

for antler velvet of farmed deer

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

- 1. has been derived from animals in a herd free from bovine tuberculosis; or
- 2. has been cooked at 60° C for 3 hours, or an equivalent temperature/time treatment.