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Joint consultation by Department for Environment, Food and Rural Affairs, Welsh Assembly Government and Food Standards Agency on proposals for changes to BSE testing of cattle slaughtered for human consumption

April 2011



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Part I – Introduction

What is the purpose of this consultation?

1.1 European Union (EU) Member States have agreed an amendment to [Commission Decision 719/2009/EC](#) to provide the United Kingdom (UK) and 21 other Member States with the options of (i) increasing the age threshold above which healthy cattle slaughtered for human consumption require testing for bovine spongiform encephalopathy (BSE), from 1 July 2011; and (ii) testing a sample of such cattle from 1 January 2013. A copy of the draft Commission Decision is at Annex D.

1.2 We are consulting non-formally on implementing this change as required by Article 9 of Regulation (EC) No. 178/2002¹. Defra and the Welsh Assembly Government will seek advice from the Food Standards Agency (FSA) and health Ministers before making any changes to BSE testing of cattle slaughtered for human consumption in England and Wales.

Who will be affected by the proposals in this consultation?

1.5 The cattle and meat industries, principally abattoirs that slaughter for human consumption cattle aged over 48 months. Consumers will also have an interest.

Have there been any previous consultations on this topic?

1.6 Defra, the Welsh Assembly Government and the Food Standards Agency consulted on changes to BSE testing in September 2008 and on the *TSE Roadmap 2*, in July 2010.

How do I comment on these proposals?

1.7 Your views are sought on the proposals described in Part II of this document. Specific questions have been highlighted and the changes summarised at paragraph 2.14 .

1.8 The consultation package includes a partial Impact Assessment. This provides further detail on the above measures in terms of their impact on stakeholders. **We invite your comments on the proposed changes.**

1.9 The Welsh Assembly Government and the Food Standards Agency have been fully involved in the preparation of these consultation papers.

1.10 Separate consultations on proposals to make similar changes in Scotland and Northern Ireland are being carried out in those countries.

How do I respond?

¹ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.

1.11 Please send responses **to arrive by 6 May 2011** to either:

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Tel: 020 7238 6535
Fax: 020 7238 3114

Or email: BSETesting.ProposedChanges@defra.gsi.gov.uk

1.13 When responding, please state whether you are responding as a private individual or on behalf of an organisation or company.

Part II – Proposed changes to BSE Testing of cattle slaughtered for human consumption

Background

2.1 The EU TSE² Regulation³ requires all EU Member States to carry out an annual surveillance programme for transmissible spongiform encephalopathy (TSE). In relation to cattle, the annual monitoring programme in all Member States must include BSE testing of:

- i. all 'at risk' cattle aged over 24 months: These are emergency slaughtered cattle, cattle showing clinical signs at ante-mortem inspection and cattle that have died or been killed other than for human consumption;
- ii. all 'healthy slaughtered' cattle aged over 30 months: cattle slaughtered normally for human consumption;
- iii. all 'clinical suspects': cattle suspected of being affected with BSE.

2.2 During 2009 and 2010, the EU agreed that the UK and sixteen⁴ other Member States could increase the age threshold for BSE testing of 'at risk' cattle and 'healthy slaughtered' cattle born in those countries to 48 months. These Member States had demonstrated: a declining or low prevalence of BSE; that they had implemented the EU BSE surveillance programme and the EU feed ban for at least six years; and, had applied to revise their BSE testing programmes.

2.3 The Commission's *TSE Roadmap 2*⁵, published in 2010, outlines possible amendments to adjust EU TSE rules over the period 2010-15. The Commission's objective is to continue to review the measures, to ensure that they are proportionate to the risk, while assuring a high level of food safety. Amendments to EU TSE rules will be taken following a stepwise approach supported by scientific advice from the European Food Safety Authority (EFSA).

Proposed changes

2.4 Following an opinion⁶ from EFSA published on 13 December 2010, on risks to changes to the BSE testing programme in certain Member States, EU Member States have agreed a Commission proposal that allows the UK (including the Channel Islands and the Isle of Man) and twenty-one⁷ other Member States, the options of:

² Transmissible spongiform encephalopathy

³ Regulation (EC) No 999/2001 of the European Parliament and of the Council

⁴ Austria, Belgium, Cyprus, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Slovenia, Spain and Sweden.

⁵ http://ec.europa.eu/food/food/biosafety/tse_bse/docs/roadmap_2_en.pdf

⁶ <http://www.efsa.europa.eu/en/efsajournal/pub/1946.htm>

⁷ Austria, Belgium, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Portugal, Slovenia, Spain and Sweden.

- i. increasing the age threshold for BSE testing of all 'healthy slaughtered' cattle from 48 months to 72 months, from 1 July 2011; and,
- ii. testing a minimum sample of 'healthy slaughtered' cattle aged over 72 months, from 1 January 2013. The EU will agree the minimum sample size at a later date: it is likely to be linked to the size of the cattle population in each Member State.

2.5 These twenty-two Member States have demonstrated: a declining or low prevalence of BSE; that they have implemented the EU BSE surveillance programme and the EU feed ban for at least six years; and, have applied to revise their BSE testing programmes. The concessions will apply only to cattle born in these Member States. The age threshold for testing cattle born elsewhere will remain at 24 months for 'at risk' cattle and 30 months for 'healthy slaughtered' cattle.

2.6 EFSA has advised that prevention of human exposure to BSE mainly relies on the removal of specified risk material (SRM), such as brain and spinal cord. EFSA has further advised that, under a realistic assumption that BSE continues to decline across the twenty-two Member States:

- i. increasing the age threshold for testing 'healthy slaughtered' cattle for BSE to 72 months would result in less than one BSE case being missed in 2011 and fewer cases thereafter; and
- ii. stopping the testing of 'healthy slaughtered' cattle from 2013 would result in less than one BSE case being missed in that year and fewer cases thereafter.

2.7 BSE will remain a notifiable disease and clinical suspects of all ages will continue to be tested. SRM controls, which are the key food safety controls for BSE, remain in place - as does the ban on feeding meat and bone meal from cattle, sheep and goats to all farmed livestock, which is the key control to protect animal health.

2.8 Over 2.04 million healthy cattle slaughtered for human consumption were tested for BSE in Great Britain from November 2005 to the end of 2010. There were ten cases of BSE detected (Annex A), of which two were less than 72 months of age (one in 2006 and one in 2008) (Annex B).

Advice from the Spongiform Encephalopathy Advisory Committee (SEAC)

2.9 SEAC has provided independent advice (Annex E) to the FSA on the risk of the proposed changes in the UK.

Legislation

2.10 The European Union (EU) has agreed an amendment to Commission Decision 719/2009/EC to provide the UK and 21 other Member States with the options of making changes to BSE testing of 'healthy slaughtered' cattle. Schedule 1 of the Transmissible Spongiform Encephalopathy (England) Regulations 2010 contains an ambulatory reference to Commission Decision 719/2009/EC which means that Defra will not need to amend the Transmissible Spongiform Encephalopathy (England) Regulations 2010 to make the changes to BSE testing of healthy slaughtered cattle in

England. The Transmissible Spongiform Encephalopathies (Wales) Regulations 2008 are being amended to include a similar ambulatory reference. The updated Transmissible Spongiform Encephalopathies (Wales) Regulations are expected to come into force by 1 July 2011.

Impact Assessment

2.11 This is a deregulatory measure. Currently all 'healthy slaughtered' cattle for human consumption aged over 48 months require BSE testing. Based on data for 2010, raising the testing threshold to include all 'healthy slaughtered' cattle over 72 months will reduce the number of these cattle that require testing by about 27%.

2.12 We expect that other eligible Member States will increase the age threshold for BSE testing 'healthy slaughtered' cattle for human consumption, from 1 July 2011. There would be a competitive disadvantage for UK meat producers if the UK continued to require BSE testing of 'healthy slaughtered' cattle aged 48-72 months, while other Member States lifted this requirement. Prior BSE testing of 'healthy slaughtered' cattle is not required for meat imported from third countries.

2.13 A draft Impact Assessment accompanies this consultation. This considers the proposed increase in the age threshold for BSE testing of 'healthy slaughtered' cattle to 72 months. The option of testing a sample of these cattle from 1 January 2013 will be considered in a future Impact Assessment following further changes to EU law.

What happens next?

2.14 Before this change can be implemented in the UK:

- The FSA Board will consider whether to advise Ministers that the change is acceptable in terms of public health risk in relation to food at their Open meeting on 25 May.
- In light of the FSA advice to Health Ministers, Defra and the Welsh Assembly Government will decide whether or not to raise the age above which 'healthy slaughtered' cattle must be BSE tested to 72 months from 1 July 2011 and to move to testing a sample of healthy cattle aged over 72 months from 1 January 2013.

Questions for Stakeholders

2.15 Stakeholders are asked the following questions:

- (i) Do you agree that it would be acceptable to increase to 72 months the age above which 'healthy slaughtered' cattle born in 22 Member States must be tested for BSE? If not, please explain why.**
- (ii) Do you agree that it is appropriate to move to testing a sample of 'healthy slaughtered' cattle aged over 72 months from 1 January 2013? Do you have any comments on how this should be implemented?**
- (iii) Do you have any comments on the Impact Assessment?**
- (iv) Are there any other comments you wish to make?**

BSE cases in healthy cattle slaughtered for human consumption in Great Britain since November 2005

	Date of birth	Date of death	Age at death (months)
1.	18/02/1997	28/07/2006	113
2.	10/09/1999	01/09/2006	83
3.	12/08/2002	06/09/2006	48
4.	27/07/2000	27/04/2007	81
5.	05/04/1999	28/06/2007	98
6.	21/09/1998	04/09/2007	107
7.	30/09/1997	04/02/2008	124
8.	11/01/2003	03/07/2008	65
9.	24/11/1999	08/07/2008	103
10.	26/09/1996	13/11/2008	145

Over 2.04 million healthy cattle slaughtered for human consumption were tested for BSE in Great Britain from November 2005 to the end of 2010.

Annex B

BSE cases aged less than 72 months in healthy cattle slaughtered for human consumption in Great Britain since 2005

	Year of slaughter					
	2005	2006	2007	2008	2009	2010
Number of BSE cases in healthy cattle slaughtered for human consumption aged 72 months or less	0	1	0	1	0	0

Over 2.04 million healthy cattle slaughtered for human consumption were tested for BSE in Great Britain from November 2005 to the end of 2010.

BSE Testing requirements for cattle slaughtered in England and Wales
by country of birth

Country of birth	Current BSE testing age for Healthy slaughter cattle	If adopted, BSE Testing age for Healthy slaughter cattle from 1 July 2011
Austria	Over 48 months	Over 72 months
Belgium	Over 48 months	Over 72 months
Cyprus	Over 48 months	Over 72 months
Denmark	Over 48 months	Over 72 months
Finland	Over 48 months	Over 72 months
France	Over 48 months	Over 72 months
Germany	Over 48 months	Over 72 months
Greece	Over 48 months	Over 72 months
Ireland	Over 48 months	Over 72 months
Italy	Over 48 months	Over 72 months
Luxemburg	Over 48 months	Over 72 months
Netherlands	Over 48 months	Over 72 months
Portugal	Over 48 months	Over 72 months
Slovenia	Over 48 months	Over 72 months
Spain	Over 48 months	Over 72 months
Sweden	Over 48 months	Over 72 months
UK	Over 48 months	Over 72 months
Channel Islands and Isle of Man	Over 30 months	Over 72 months
Estonia	Over 30 months	Over 72 months
Hungary	Over 30 months	Over 72 months
Latvia	Over 30 months	Over 72 months
Lithuania	Over 30 months	Over 72 months
Malta	Over 30 months	Over 72 months
All other countries	Over 30 months	Over 30 months

SANCO/13346/2010 rev.5

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DOES NOT NECESSARILY REFLECT THE VIEW OF COMMISSION
DEPARTMENTS**



EUROPEAN COMMISSION

Brussels,
C(2011)

Draft

COMMISSION DECISION

of

**amending Decision 2009/719/EC authorising certain Member States to revise their
annual BSE monitoring programmes**

COMMISSION DECISION

of

amending Decision 2009/719/EC authorising certain Member States to revise their annual BSE monitoring programmes

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,
Having regard to Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies⁸, and in particular the second subparagraph of Article 6(1b) thereof,

Whereas:

- (1) Regulation (EC) No 999/2001 lays down rules for the prevention, control and eradication of transmissible spongiform encephalopathies (TSEs) in animals. It requires each Member State to carry out an annual monitoring programme for TSEs in accordance with Annex III to that Regulation.
- (2) Regulation (EC) No 999/2001 provides that the annual monitoring programmes are to cover as a minimum certain subpopulations of bovine animals referred to in Article 6 thereof. Those subpopulations are to include all bovine animals above 24 or 30 months of age, the age limit depending on the categories listed in points 2.1, 2.2 and 3.1 of Part I of Chapter A of Annex III to that Regulation.
- (3) The Annex to Commission Decision 2009/719/EC of 28 September 2009 authorising certain Member States to revise their annual BSE monitoring programmes⁹ lists seventeen Member States authorised to revise their annual monitoring programme in accordance with Regulation (EC) No 999/2001. That list includes all the Member States that were Members of the Union before 1 May 2004, as well as Slovenia and Cyprus.
- (4) On 9 December 2010, the Panel on Biological Hazards (BIOHAZ) of the European Food Safety Authority (EFSA) adopted a scientific opinion on a second update on the risk for human and animal health related to the revision of the BSE Monitoring regime in some Member States¹⁰ (the EFSA opinion). For the EFSA opinion, the BIOHAZ was asked to analyse the data available for the 17 Member States listed in Decision 2009/719/EC and 8 other Member States. The BIOHAZ assumed that all 25 Member States had implemented for at least six years a BSE surveillance system and control measures, as provided for in Regulation (EC) No 999/2001. The EFSA opinion confirms that the BSE epidemic has been declining in the 17 Member States listed in Decision 2009/719/EC.
- (5) The EFSA opinion also concludes that if the age limit for BSE testing would be raised to 72 months in healthy slaughtered cattle, less than one classical BSE case could be

⁸ OJ L 147, 31.5.2001, p. 1.

⁹ OJ L 256, 29.9.2009, p. 35.

¹⁰ EFSA Journal 2010;8(12):1946.

expected to be missed in 2011. In addition, it concludes that if BSE testing for healthy slaughtered cattle would stop as from 1 January 2013, less than one classical BSE case would be missed each calendar year from 2013 onwards. That finding of the EFSA implies that the risk for human and animal health would be negligible if the current BSE testing would be adapted accordingly.

- (6) Taking into account the conclusions of the EFSA opinion, the ages of the categories of bovine animals should be increased for animals covered by the revised annual monitoring programmes of the Member States listed in the Annex to Decision 2009/719/EC. Therefore, Member States that have been authorised to revise their annual monitoring programmes should be given the option to apply alternative but equally effective sampling plans while adapting to the epidemiological situation from 1 January 2013 onwards.
- (7) Regarding the eight Member States not listed in Decision 2009/719/EC, the EFSA opinion concludes that the classical BSE epidemiological situation is different for a group of five Member States comprised of Estonia, Latvia, Lithuania, Hungary and Malta and another group comprised of three Member States, namely the Czech Republic, Poland and Slovakia.
- (8) In the group of five Member States, no BSE cases have been detected since full implementation of the Union surveillance system on 1 May 2004, and the classical BSE epidemiological situation should be considered to be 'at least equivalent' to that of the 17 Member States listed in Decision 2009/719/EC. Therefore, a similar testing regime should be applied to that group of 22 Member States as the epidemiological situation is comparable in all of them.
- (9) In addition, the EFSA opinion concludes that the trend of the classical BSE epidemic in the Czech Republic, Poland and Slovakia shows two waves in the classical BSE incidence per birth cohort and in the average age of the classical BSE cases detected. This second wave pattern compromises the establishment of clear similarities between the trend of the classical BSE epidemic in the seventeen Member States already listed in Decision 2009/719/EC and this group of three Member States. For these three Member States, it concludes that at present, it would not be informative to estimate the number of undetected classical BSE cases, should the testing age be changed in this group.
- (10) On 26 March 2010, Latvia submitted to the Commission an application to revise its annual BSE monitoring programme.
- (11) On 16 June 2010, Estonia submitted to the Commission an application to revise its annual BSE monitoring programme.
- (12) On 7 October 2010, Lithuania submitted to the Commission an application to revise its annual BSE monitoring programme.
- (13) On 21 October 2010, Luxembourg submitted to the Commission an application to revise its annual BSE monitoring programme.
- (14) On 27 October 2010, Germany submitted to the Commission an application to revise its annual BSE monitoring programme.
- (15) On 24 November 2010, Greece submitted to the Commission an application to revise its annual BSE monitoring programme.
- (16) On 26 November 2010, Slovenia submitted to the Commission an application to revise its annual BSE monitoring programme.

- (17) On 30 November 2010, Sweden submitted to the Commission an application to revise its annual BSE monitoring programme.
- (18) On 13 December 2010, Spain submitted to the Commission an application to revise its annual BSE monitoring programme.
- (19) On 13 December 2010, Belgium submitted to the Commission an application to revise its annual BSE monitoring programme.
- (20) On 13 December 2010, Finland submitted to the Commission an application to revise its annual BSE monitoring programme.
- (21) On 14 December 2010, Denmark submitted to the Commission an application to revise its annual BSE monitoring programme.
- (22) On 15 December 2010, United Kingdom submitted to the Commission an application to revise its annual BSE monitoring programme.
- (23) On 15 December 2010, Austria submitted to the Commission an application to revise its annual BSE monitoring programme.
- (24) On 20 December 2010, Ireland submitted to the Commission an application to revise its annual BSE monitoring programme.
- (25) On 23 December 2010, Portugal submitted to the Commission an application to revise its annual BSE monitoring programme.
- (26) On 5 January 2011, Cyprus submitted to the Commission an application to revise its annual BSE monitoring programme.
- (27) On 13 January 2011, Italy submitted to the Commission an application to revise its annual BSE monitoring programme.
- (28) On 18 January 2011, Netherlands submitted to the Commission an application to revise its annual BSE monitoring programme.
- (29) On 19 January 2011, France submitted to the Commission an application to revise its annual BSE monitoring programme.
- (30) On 11 February 2011, Hungary submitted to the Commission an application to revise its annual BSE monitoring programme.
- (31) On 14 February 2011, Malta submitted to the Commission an application to revise its annual BSE monitoring programme.
- (32) The applications submitted by those twenty-two Member States were found to meet all the requirements for the revision of the annual monitoring programmes laid down in Article 6(1b) of Regulation (EC) No 999/2001 and set out in point 7 of Part I of Chapter A of Annex III thereto. Therefore, they should be authorised to revise their BSE annual monitoring programmes.
- (33) Article 3 of Regulation (EEC) No 706/73 of the Council of 12 March 1973 concerning the Community arrangements applicable to the Channel Islands and the Isle of Man for trade in agricultural products¹¹ provides that Union veterinary and food legislation are to apply, under the same conditions in the Channel Islands and the Isle of Man as in the United Kingdom, to the agricultural products imported into those islands or exported from them to the Union. However, Decision 2009/719/EC does not currently apply to the islands as the United Kingdom did not provide the relevant data at the time of its adoption.

¹¹ OJ L 68, 15.3.1973, p. 1.

- (34) The United Kingdom has now provided the relevant data concerning the epidemiological situation and the implementation of the Union legislation regarding BSE in the Channel Islands and the Isle of Man. This data shows that the BSE epidemiological situation in those islands is comparable to that of the United Kingdom and that all the relevant requirements laid down in the Article 6(1b) and set out in point 7 of Part I of Chapter A of Annex III to Regulation (EC) No 999/2001 are met. Decision 2009/719/EC should therefore apply to those islands.
- (35) Accordingly, the Annex to Decision 2009/719/EC should be amended to include Estonia, Hungary, Latvia, Lithuania and Malta and also the Channel Islands and the Isle of Man.
- (36) Commission Decision 2009/719/EC should therefore be amended accordingly.
- (37) This Decision should apply from 1 July 2011 in order to give sufficient time to Member States to align their BSE monitoring procedures with the amendments made to Decision 2009/719/EC by this Decision.
- (38) The measures provided for in this Decision are in accordance with the opinion of the Standing Committee on the Food Chain and Animal Health,

HAS ADOPTED THIS DECISION:

Article 1

Decision 2009/719/EC is amended as follows:

(1) Article 2 is replaced by the following:

"Article 2

1. The revised annual monitoring programmes shall apply only to bovine animals born in the Member States listed in the Annex and shall cover at least the following categories:
 - (a) all bovine animals above 72 months of age subject to normal slaughter for human consumption, or slaughtered in the context of a disease eradication campaign but showing no clinical signs of disease, as referred to in point 2.2 of Part I of Chapter A of Annex III to Regulation (EC) No 999/2001;
 - (b) all bovine animals above 48 months of age subject to emergency slaughter or with observations at ante mortem inspection as referred to in point 2.1 of Part I of Chapter A of Annex III to Regulation (EC) No 999/2001;
 - (c) all bovine animals above 48 months of age, as referred to in point 3.1 of Part I of Chapter A of Annex III to that Regulation, which have died or been killed but which were not:
 - (i) killed for destruction pursuant to Commission Regulation (EC) No 716/96*;
 - (ii) killed in the framework of an epidemic, such as foot-and-mouth disease;
 - (iii) slaughtered for human consumption.
2. When bovine animals belonging to the animal categories referred to in paragraph 1 and born in one of the Member States listed in the Annex are tested for BSE in another Member State, the age limits for testing in force in the Member State where the tests are performed shall apply.
3. By way of derogation from point (a) of paragraph 1, from 1 January 2013 Member States listed in the Annex may decide to test only a minimum annual sample of the subpopulations referred to in that point.

* OJ L 99, 20.4.1996, p. 14."

(2) The Annex is replaced by the text in the Annex to this Decision.

Article 2

This Decision shall apply from 1 July 2011.

This Decision is addressed to the Member States.

Done at Brussels,

For the Commission

John DALLI

Member of the Commission

ANNEX

'ANNEX

List of Member States authorised to revise their BSE annual monitoring programmes

- Belgium
- Denmark
- Germany
- Estonia
- Ireland
- Greece
- Spain
- France
- Italy
- Cyprus
- Latvia
- Lithuania
- Luxembourg
- Hungary
- Malta
- Netherlands
- Austria
- Portugal
- Slovenia
- Finland
- Sweden
- United Kingdom and the Channel Islands and the Isle of Man'

POSITION STATEMENT ON THE REQUIREMENTS FOR BSE TESTING OF HEALTHY CATTLE

SEAC was asked by the Food Standards Agency to consider the change in risk to consumers from exposure to BSE that would result if (a) from 2011, the age threshold for BSE testing healthy slaughter cattle was raised from 48 to 72 months and (b) BSE testing of healthy slaughter cattle was to stop altogether.

FSA presented to SEAC an analysis carried out by the Veterinary Laboratories Agency (VLA) assessing the impact of reducing the level of BSE testing of healthy cattle slaughtered for human consumption, using a mathematical model developed at VLA. The model predicts the number of additional infected cattle that would be consumed if monitoring is reduced and estimates the consequent impact on the amount of infectivity entering the food supply.

SEAC advises that in the short-term there is an insignificant additional risk to human health that would result from raising the age for healthy slaughter cattle from 48 to 72 months. The VLA modelling results concur with the low numbers of cattle now being identified with BSE. However, SEAC notes that this conclusion is only valid if the prevalence of BSE in the UK cattle population remains at or decreases from its current value. The current and future validity of this analysis therefore depends critically on the nature and quality of BSE surveillance within the cattle population, and in particular its capacity to ensure the early detection of any re-emerging epidemic. This assessment would equally apply to any proposal to cease altogether the testing of healthy slaughter cattle. SEAC considers that any change in the incidence of BSE is most likely to be detected in fallen stock and casualty animals because of the currently higher likelihood of detecting BSE in these sub-populations. Provided that surveillance of fallen stock and casualty animals is sufficient to provide the necessary information about disease incidence and prevalence, the additional risk to consumers of reducing testing of healthy cattle will remain small.

In addition, SEAC offers the following observations that the FSA and other interested Government Departments might wish to consider:

- (a) Surveillance is the only effective means of monitoring changes in the incidence or prevalence of BSE. It is therefore important that current surveillance protocols are kept under review, to ensure that they are capable of detecting an increase in BSE prevalence both in an appropriate time frame and at a suitable sensitivity to detect an increase in prevalence that would warrant reintroduction of testing healthy slaughtered cattle.
- (b) It is not clear that testing a sample of healthy slaughter cattle older than 72 months would provide much useful information: this age group might be sub-optimal. The arguments for random testing of healthy slaughter cattle at this

age, compared to other ages, should be considered carefully, taking account of the purpose of this sampling, the sample size and test sensitivity (by incubation period) amongst other considerations.

- (c) UK data should continue to be used to demonstrate a decline in the prevalence of BSE in the UK herd, rather than relying on EU-wide figures.
- (d) It is instructive to use the VLA model to examine a range of hypothetical rates of increase in BSE infection and the ability of current surveillance measures to detect the change, and this should be repeated as necessary when significant changes to current practices are envisaged.
- (e) Changing one BSE control measure can have knock-on effects on other control measures and it is important that the possibility of such interactions is fully taken into account when a proposal such as this is considered.

30 MARCH 2011