



BVA, Sheep Veterinary Society, and Veterinary Public Health Association response to Defra on ageing sheep at the slaughterhouse: consultation on a proposal to introduce an optional alternative method to dentition for the purposes of removing Specified Risk Material

31 October 2019

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. Our response has been formulated in close liaison with the Sheep Veterinary Association (SVS) which promotes sheep health and welfare as a specialist division of the BVA, and with the Veterinary Public Health Association (VPHA) which aims to further the advancement of veterinary public health within the UK and abroad through the development of legislation, the delivery of training, and the promotion of the role of the veterinarian in public health at all levels.

The proposal

3. The proposal to amend the Transmissible Spongiform Encephalopathies (England) Regulations 2018 and the Transmissible Spongiform Encephalopathies (Wales) Regulations 2018, will provide the English and Welsh sheep industries the option of an EU derogation for an EU Member State, which enables the ageing of sheep at slaughter to be determined by a means other than dentition.
4. The proposal is to introduce a new optional ageing system that will see sheep born in the previous calendar year and submitted for slaughter in the calendar year following their birth after an annual cut-off date of 30 June considered as aged over 12 months and therefore requiring the removal of the spinal cord as Specified Risk Material (SRM). Sheep born in the previous calendar year and submitted for slaughter in the calendar year following their birth before an annual cut-off date of 30 June would be considered as aged under 12 months and would not require removal of the spinal cord, as not deemed to be SRM.
5. We recognise that a risk assessment undertaken by the Animal and Plant Health Agency (APHA) has confirmed that the optional system would not compromise existing food safety or result in any additional risks to either public or animal health. Although the results of that assessment suggest that changing to a date based cut off for ageing sheep would slightly increase the estimated infectivity entering the food chain and category 3 materials, we recognise that several worst case assumptions were used to estimate the risk, including that an estimated 5-10% of all re-classified animals are aged between 12-18 months and that the infectivity titre in an animal aged 12-18 months is the same as in an adult sheep.

6. However, we have a number of concerns regarding the proposal as follows:

- **Traceability** – the declaration (i.e. the year in which the animal was born) must follow the animal from birth to slaughter. This will require a system of audit which must be sufficiently robust to ensure traceability for sheep sold for slaughter via a market/collection centre and must ensure that the 'year of birth is accurately and consistently recorded between the farm of origin declaration and the market declaration. In Wales all sheep are EID scanned pre-slaughter and notified to the relevant authority, which provides some assurance that sheep are correctly identified and of an age that equates with the declaration.
- **Cross-border continuity** – the proposal currently only applies to England and Wales. Where possible there should be a consistent approach across the UK in order to avoid cross-border movement of sheep with teeth erupted. We understand that DAERA in Northern Ireland will continue with dentition-based ageing only, as they do not wish to risk any disruption to trade in lamb meat or Animal By-Products to the EU (specifically to Ireland) from a date-based ageing method.
- **Consumer confidence and trade** – whilst the risk to public health is extremely low, we have significant concerns that the changes may lead to a loss of confidence amongst consumers and potential trade partners. This is particularly important at this time of political upheaval and resulting uncertainty for the agri-food sector, when the UK Government should be prioritising the development of a unique, high standard of animal health, welfare and food safety as a selling point for UK produce. It is encouraging that the consultation document recognises that the decision to leave the EU and our listing by the EU as a Third Country must influence decisions in this area, and that there is a commitment to take stock and consider whether there will be any risks to trade before taking the proposal forward. We would urge discussion with the European Commission on the detail before progressing the plans any further as we understand that EU Member States use dentition as the primary method of ageing sheep and divergence at this critical point could have serious implications for trade. Consideration must also be given to the acceptability of the system to potential trading partners outside the EU, and the potential damage to public perception of the industry if there is a resulting difference in standards between domestic and export supply.
- **Enforcement** - Although there are merits to a date-based system as it removes the risk of prosecution if an erupted tooth is missed at processing, in the event of a dual-system it is unclear how the difference between a date aged carcass and a carcass dated by dentition would be identified once the health mark had been added.
- **Customer contracts** - customer contracts currently require, and will likely continue to require, dentition checks, and processors will pay producers accordingly. The definition of 'lamb' in food service would need to be clarified if the proposals were implemented.
- **Animal by-products** – the proposal as it stands could lead to sheep heads with erupted teeth entering ABP Cat 3 containers, which will be problematic for export health certification for the pet food trade.

Conclusion

7. In conclusion, although we recognise that the proposals are intended to represent a pragmatic and risk-based approach to reducing complexity, costs, and burdens in the food chain, there are a number of potential impacts which do not appear to have been adequately considered. As such we are unable to support the proposal until there is further appropriate consideration of any immediate and potential longer-term risks, particularly with regard to consumer confidence at home and export capability in the context of EU Exit.