



March 2019

JOINT BVA SCOTTISH BRANCH, AGV, BCVA, FVS, GVS, SVS AND VPHA RESPONSE TO PROPOSAL TO AMEND THE TRANSMISSABLE SPONGIFORM ENCEPHALOPATHIES (SCOTLAND) REGULATIONS 2010

- 1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and 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) BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.
- 3) Our response has been formulated in close liaison with the Veterinary Public Health Association (VPHA), a division of BVA committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues. We have also consulted with specialist divisions the Fish Veterinary Society (FVS), the Sheep Veterinary Society (SVS), the Goat Veterinary Society (GVS), the Association of Government Vets (AGV), and the British Cattle Veterinary Association (BCVA), who support this response.
- 4) We strongly support a risk-based, proportionate approach that eliminates any unnecessary burdens, and support proposals which will contribute to TSE controls that are based on scientific advice and are considered proportionate to the risk to public and animal health in line with the European Commission's TSE Roadmap 2, (2010-2015). We understand that the TSE Roadmap 2 officially ended on 31 December 2015 and, in the absence of a new EU TSE strategy document, the Commission wants TSE controls to be renegotiated in line with the outstanding items of the Roadmap. The aim is to continue to align TSE controls closer with the international standards of the World Organisation for Animal Health (OIE), if considered safe and backed up by scientific evidence, and we are supportive of this approach.
- 5) Removal of the requirement for abattoirs slaughtering cattle that require BSE testing to have a required method of operation

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We support the proposal on the basis that it is in line with Commission Decision 2013/76/EU and appears to be proportionate to the risk. We strongly support the proposed requirement for abattoir operators to agree a Standard Operating Procedure (SOP) with the FSS.

- 6) Amendment to domestic legislation regarding on-farm controls for classical scrapie
We support the proposals.

- 7) Proposal to permit the feeding of pig and poultry processed animal protein to farmed fish
We support the proposal to permit the feeding of pig and poultry processed animal protein to farmed fish, as a potential high-quality source of sustainable protein. Pigs, poultry and fish are not known to be able to contract or pass on BSE naturally and therefore the proposal appears to be proportionate to the risk, in line with independent scientific advice from EFSA, and will simply represent the adoption in legislation of a derogation that was implemented administratively across the UK in June 2013.

- 8) Proposal to enable the feed industry to use PAP derived from insects in feed for aquaculture

We support the proposal to enable the feed industry to use processed insect protein in feed for aquaculture on the basis that EFSA scientific opinion has concluded that the occurrence of prions in non-processed insects is expected to be equal or lower to current protein sources as long as insects are fed on substrates that do not harbour material of ruminant or human origin. As the processing of insects may further reduce the occurrence of biological hazards we believe that the proposal is proportionate to risk.

- 9) Amend the list of tissues from ruminants (cattle, sheep and goat) that are designated as Specified Risk Material to reflect changes to EU legislation
We agree with this proposal.

- 10) Amendment to labelling of bovine carcasses which require vertebral column (SRM) removal
We agree with this proposal.

- 11) Provide a statutory mechanism by which food business operators can apply for approval to use an alternative method of spinal cord removal, other than carcass splitting, for sheep and goats aged over 12 months of age.

We are content to support the proposed provision of a statutory mechanism by which food business operators can apply to the FSS for approval to use an alternative method of spinal cord removal should an effective alternative become available. We agree that carcass splitting should remain the default method.

- 12) Clarify wording relating to the removal of SRM from sheep and goats in a slaughterhouse
We support the proposed clarification on SRM removal in slaughterhouses in response to the issues raised during legal proceedings taken against a UK food business operator in 2013 for failing to remove SRM from ewe carcasses.

- 13) Provide a statutory mechanism to permit the Competent Authority of the Member State of slaughter to approve an alternative method, other than dentition, to determine the age of sheep and goats for SRM removal purposes

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We are supportive of this proposal.

- 14) Proposal to amend the specification of the colouring agent for the staining of SRM
We are supportive of this proposal.

15) Conclusion

In conclusion, we are supportive of the proposals which appear to be proportionate to the risk to public and animal health and in line with the European Commission's TSE Roadmap 2.