September 2016

BRITISH VETERINARY ASSOCIATION / SCOTTISH BRANCH/ BCVA JOINT RESPONSE TO THE SCOTTISH GOVERNMENT’S CONSULTATION ON AN APPLICATION FOR BSE NEGLIGIBLE RISK STATUS FOR SCOTLAND

Introduction and background

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 15,000 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. 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 the Scottish members on Scottish and United Kingdom issues.

3. The British Cattle Veterinary Association (BCVA) is a specialist cattle division of the British Veterinary Association comprising 1300 members of whom approximately 950 are practising veterinary surgeons working with cattle in farm animal veterinary practice.

4. In producing this consultation response, we have consulted with our Ethics and Welfare Group and we are aware of the British Cattle Veterinary Association’s response.

Q1. Are you in favour or against an application for BSE NR status for Scotland?

5. BVA Scottish Branch is in favour of an application for BSE NR Status for Scotland provided that that testing and food safety arrangements remain unchanged unless an OIE risk assessment indicated that this was appropriate.

Q2. Do you have any comments in relation to the benefits and from the reduction in the volume of SRM? What advantages or disadvantages do you anticipate from the reduction in the volume of SRM?

6. None.

Q3 Do you have any comments to make from a public health perspective in relation to the relaxation of SRM-related controls?

7. As the risk of a BSE animal entering the food chain is, in the first place, low and the safety measure of SRM controls which will remain in place and industry has confirmed that abattoirs already operate robust systems for the batching of animals of different jurisdictions or stock category and that receiving animals of differing BSE risk categorisations, we believe that the proposal is entirely proportionate. However, we are of the view that there must be a robust following of import tracings and stress the need for governments to take account of the need to ensure ongoing clinical surveillance of suspicious cases.
Q4. Do you have any comments from a consumer perspective?

8. None.

Q5. In relation to the separation and disposal of SRM from CR and NR animals do you have any further comments?

9. None.

Q6 Do you have any concerns that the reduction in the amount of SRM for disposal may reduce the capacity for disposal of SRM and fallen stock in Scotland, and may result in:

- increased costs for disposal of SRM and fallen stock of all species?
- disposal constraints in an epizootic disease outbreak?

10. None.

Q7. Do you have any comments on or any evidence to support the perception that countries with NR status have an improved global image?

11. None.

Q8. Do you have any comments on the issue of trade being negatively affected in existing markets should Scotland obtain NR status e.g. due to revision of existing export certificates?

12. None.

Q9. If Scotland is upgraded to NR status can you provide examples of how/where trade will improve? This includes accessing new markets and negotiating existing ones

13. None.

Q10. Do you have any comments on possible advantages or disadvantages to other sectors in Scotland? (i.e. dairy, sheep, pork, white meat, equine etc?)

14. No comment.

Q11. If Scotland were successful in achieving NR status, have you any comments on the impact to industry should NR status subsequently be lost?

15. The impact will depend upon whether or not sufficient contingency arrangements have been developed and are in place. By ensuring the right contingency arrangements are put in place this would help to minimise any impact resulting from the loss of NR status and any such arrangements should be developed with veterinary input.

Q12. Do you agree that, in order to mitigate the commercial risk in the event of loss of NR status, industry should work towards putting contingency arrangements in place?

16. See comments to question 11 above